

Exhibit D

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/26/2007	0.6	T/c w/ E. Packman re: IJL's deceptive sales practices & possibility of filing Class Action.	JLN	\$520	\$312
7/27/2007	0.8	Read consumer affairs.com article re IJL's deceptive sales tactics; began process of trying to identify former IJL employees identified in article.	JLN	\$520	\$416
7/29/2007	2.25	Research re: N.Y. AG's findings against IJL re: unlawful billing practices	JLN	\$520	\$1,170
7/30/2007	3.25	Legal research re: NY consumer fraud laws, GBL 349 & 394-c	JLN	\$520	\$1,690
8/1/2007	3.8	Researched complaints on IJL	JLN	\$520	\$1,976
8/1/2007	2.25	Continued research re: NY consumer fraud laws, unjust enrichment and other potential causes of action	JLN	\$520	\$1,170
8/2/2007	1	Compilation of summary of research	JLN	\$520	\$520
8/2/2007	4.2	Legal research re: federal case law on consumer fraud claims & class certification of such claims	JLN	\$520	\$2,184
8/3/2007	0.8	Meeting with JLN and JGB.	CSL	\$490	\$392
8/3/2007	4.1	Conference with lawyer re: possible claims; review all investigations materials; research prior litigation and possible causes of action; e-mail strategic plan to case team.	JGB	\$590	\$2,419
8/3/2007	2.5	Compiled case overview.	NRB	\$195	\$488
8/3/2007	1.9	Meeting with E. Packman re: potential class action against IJL and her willingness to become class rep.	JLN	\$520	\$988
8/3/2007	0.8	Meeting with JGB and CSL	JLN	\$520	\$416
8/3/2007	3.6	Legal research re: case law on reliance and certification of N.Y. class actions for fraud claims	JLN	\$520	\$1,872
8/4/2007	4.8	Review of research materials	JLN	\$520	\$2,496

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/4/2007	0.8	Reviewed class action model complaint	JLN	\$520	\$416
8/6/2007	0.8	Follow up telephone conversation with E. Packman re: potential class action/rep status	JLN	\$520	\$416
8/7/2007	0.3	Meeting with JLN.	CSL	\$490	\$147
8/7/2007	0.3	Phone conference with Allison Rosenberg.	CSL	\$490	\$147
8/7/2007	0.8	URL search and acquisition.	NRB	\$195	\$156
8/7/2007	0.3	Phone call with Allison Rosenberg	JLN	\$520	\$156
8/7/2007	0.5	Spoke with Kathleen Henley, former IJL employee	JLN	\$520	\$260
8/7/2007	0.3	Meeting with CSL	JLN	\$520	\$156
8/7/2007	0.3	E-mail to JGB and CSL summarizing conversations with Allison and Kathleen	JLN	\$520	\$156
8/8/2007	0.5	Meeting with JLN.	CSL	\$490	\$245
8/8/2007	2	Compilation of IJL franchises across the U.S.	NRB	\$195	\$390
8/8/2007	4.3	Additional research on IJL; preparing outline of IJL of fraudulent acts.	JLN	\$520	\$2,236
8/8/2007	0.1	Meeting with CSL	JLN	\$520	\$52
8/8/2007	0	Prepared outline for interview of former IJL employee Katherine Henley	JLN	\$520	\$0
8/8/2007	0.5	E-mailed JGB summarizing updates on IJL class action	JLN	\$520	\$260
8/8/2007	0.8	Researched available vanity numbers for IJL class action	JLN	\$520	\$416
8/8/2007	0.5	Researched Lisa Wade McCormack (author of consumeraffairs.com article)	JLN	\$520	\$260

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/9/2007	1.5	Conference call with JLN and Katherine Henley and meeting with JLN.	CSL	\$490	\$735
8/9/2007	0.3	E-mail to JGB re: K. Henley interview and other updates	JLN	\$520	\$156
8/9/2007	0.8	Prepared summary of K. Henley interview	JLN	\$520	\$416
8/9/2007	4.25	Prepare draft of complaint	JLN	\$520	\$2,210
8/9/2007	0.5	Meeting with CSL to review phone conference with K. Henley	JLN	\$520	\$260
8/9/2007	1.25	Prepared outline for former IJL employee Katherine Henley	JLN	\$520	\$650
8/10/2007	0.3	Meeting with CSL	JLN	\$520	\$156
8/10/2007	0.9	Follow up telephone conference with KH re: IJL deceptive sales practices & procedures	JLN	\$520	\$468
8/11/2007	0.1	E-mails to JLN.	JGB	\$590	\$59
8/11/2007	4.3	Drafted complaint	JLN	\$520	\$2,236
8/12/2007	8.2	Continued drafting IJL complaint	JLN	\$520	\$4,264
8/13/2007	0.3	E-mail with attorney and co-counsel.	JGB	\$590	\$177
8/13/2007	3.9	Continued drafting IJL complaint	JLN	\$520	\$2,028
8/13/2007	2.8	Drafted complaint; e-mail to former IJL employee L. Ludmore; e-mail to JGB	JLN	\$520	\$1,456
8/14/2007	1.3	Review and edit complaint.	JGB	\$590	\$767
8/14/2007	0.9	Telephone conversation with Lisa Flick (former IJL employee Rochester) re: IJL's deceptive sales practices	JLN	\$520	\$468
8/15/2007	0.5	Reviewed complaint with JGB's changes	JLN	\$520	\$260
8/15/2007	0.4	Follow up conversation with LF re: IJL deceptive practices	JLN	\$520	\$208

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/15/2007	0.5	E-mail to K. Henley & L. Cudmore	JLN	\$520	\$260
8/16/2007	4.1	Continued drafting complaint against IJL	JLN	\$520	\$2,132
8/17/2007	0.5	E-mail to K. Henley and L. Cudmore	JLN	\$520	\$260
8/17/2007	0.8	Meeting with CSL	JLN	\$520	\$416
8/23/2007	0.5	Meeting with CSL to discuss interview with L. Cudmore	JLN	\$520	\$260
8/23/2007	0.8	Phone interview with L. Cudmore	JLN	\$520	\$416
8/23/2007	1.3	Prepared for interview with L. Cudmore	JLN	\$520	\$676
8/23/2007	6.4	Revised & edited draft complaint	JLN	\$520	\$3,328
8/23/2007	0.3	E-mailed JGB to summarize interview with L. Cudmore	JLN	\$520	\$156
8/25/2007	0.9	Another t/c with Lisa Cudmore re: IJL deceptive sales practices & training lessons at FDU; other possible witnesses	JLN	\$520	\$468
8/28/2007	0.7	Reviewed FDU training notes sent by Kathleen Henly	JLN	\$520	\$364
8/29/2007	2.8	Prepared summary of L. Cudmore interview	JLN	\$520	\$1,456
8/30/2007	1	Interview with K. Mallen conducted by CSL	JLN	\$520	\$520
8/30/2007	1.5	Prepared interview with K. Mallen (former IJL director in Nashville)	JLN	\$520	\$780
8/30/2007	1.4	Follow up T/c Karen Mallen re: IJL's deceptive sales tactics and other potential witnesses, including C. Craig and M. Rose	JLN	\$520	\$728
8/30/2007	0.3	Telephone call with CSL reviewing discussion with K. Mallen	JLN	\$520	\$156
9/1/2007	6.3	Started draft of Statement of Fact for IJL complaint	JLN	\$520	\$3,276

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/2/2007	4.5	Continued drafting statement of facts for IJL complaint; reviewed comments of JGB re: prior draft of complaint; made amendments to complaint per suggestions of JGB	JLN	\$520	\$2,340
9/3/2007	2.8	Continued drafting statements of facts for JGB	JLN	\$520	\$1,456
9/4/2007	1.1	Meeting with JN and JGB regarding the complaint and review of additional material.	CSL	\$490	\$539
9/7/2007	1.1	Meeting with attorney on complaint, client issues, and next steps; e-mails to attorneys; review most recent draft of complaint.	JGB	\$590	\$649
9/7/2007	0.5	Meeting with JGB re: IJL complaint	JLN	\$520	\$260
9/9/2007	0.8	Phone conference with attorneys re: client and complaint issues, including next steps.	JGB	\$590	\$472
9/9/2007	1	Conference call with JGB and CSL re: multiple strategic issues of IJL suit	JLN	\$520	\$520
9/9/2007	4.1	Review complaint, discussion with attorney and phone conference with JGB and JLN.	CSL	\$490	\$2,009
9/12/2007	1.6	Made further revisions & edits IJL complaint	JLN	\$520	\$832
9/13/2007	0.3	Follow-up e-mail sent to L. Cudmore re: sending IJL and materials; follow-up e-mail to K. Mallen re: providing info that we discussed in t/c on Aug. 30	JLN	\$520	\$156
9/13/2007	0.3	Meeting with CSL re: interview of potential plaintiff and finishing IJL complaint	JLN	\$520	\$156
9/14/2007	1.9	Made further revisions & edits to draft complaint.	JLN	\$520	\$988
9/18/2007	0.6	E-mail and phone call to assistant attorney general; review of assurances of discontinuance in matter.	JGB	\$590	\$354
9/21/2007	0.1	Discuss potential plaintiff with JGB.	CSL	\$490	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/25/2007	0.2	Discuss potential plaintiff with JLN.	CSL	\$490	\$98
9/26/2007	0.1	Brief conference with lawyers re: client issues.	JGB	\$590	\$59
9/26/2007	0.8	Telephone conversation with L. Cudmore re: sending materials; follow-up e-mail re: same	JLN	\$520	\$416
9/28/2007	0.7	Conference with attorneys re: complaint and client; e-mail attorneys re: manual.	JGB	\$590	\$413
9/28/2007	1.1	Discuss causes of action with attorneys and discussion with potential plaintiff.	CSL	\$490	\$539
9/28/2007	0.3	E-mail and follow-up e-mail to K. Mallen re: IJL Training Manual	JLN	\$520	\$156
9/28/2007	0.8	Meeting with JGB and CSL to discuss progress of suit and assorted file-related issues	JLN	\$520	\$416
9/30/2007	2.1	Research and discuss with attorney potential causes of actions, review of GBL 349.	CSL	\$490	\$1,029
10/1/2007	1.4	Added causes of action to the complaint and call to potential plaintiff.	CSL	\$490	\$686
10/2/2007	0.2	E-mail attorneys regarding drafting of complaint.	JGB	\$590	\$118
10/2/2007	0.6	Calls to E. Packman; discuss same with JLN.	CSL	\$490	\$294
10/2/2007	0.5	Meeting with CL re: IJL Manual	JLN	\$520	\$260
10/2/2007	0.25	Follow-up meeting w/ CL: e-mail to K Mallen	JLN	\$520	\$130
10/2/2007	0.8	Preliminary review of IJL manual	JLN	\$520	\$416
10/2/2007	4.7	Reviewed FDU Training Manual & IJL Handbook from Director Training in Las Vegas (June 2007); took notes re same	JLN	\$520	\$2,444
10/2/2007	1.7	Continued review of FDU Training Manual & IJL Handbook Director's Manual from training in March 2007	JLN	\$520	\$884
10/2/2007	0.75	Preliminary review of IJL Training Manual	JLN	\$520	\$390

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10/2/2007	0.3	Review of three e-mails sent by JGB	JLN	\$520	\$156
10/2/2007	0.3	Follow-up meeting with CSL; e-mail to K. Mallen	JLN	\$520	\$156
10/2/2007	0.5	Meeting with CSL re: IJL manual	JLN	\$520	\$260
10/2/2007	0.3	Meeting with CSL re: potential Statute of Limitations issues on IJL suit	JLN	\$520	\$156
10/3/2007	2.9	Review and edit proposed complaint; e-mail to attorneys with strategy for next steps.	JGB	\$590	\$1,711
10/3/2007	0.5	Meeting with JGB	JLN	\$520	\$260
10/3/2007	2.7	Reviewed additional documents provided by former IJL employees, including IJL Info Call script, IJL New Client Welcome Script, Monthly Quota for Directors & Explanation of Quota structure; took notes re same	JLN	\$520	\$1,404
10/3/2007	0.3	Meeting with JGB and CSL to discuss IJL plaintiff and filing of complaint	JLN	\$520	\$156
10/3/2007	0.3	Exchange of e-mails with L. Cudmore re: sending IJL materials to office	JLN	\$520	\$156
10/3/2007	0.7	Conduct additional review of the complaint and discussions with regards to filing.	CSL	\$490	\$343
10/4/2007	0.4	Discuss with attorney causes of action, including possible breach of contract; review complaint and possible exhibit.	JGB	\$590	\$236
10/4/2007	0.25	Meeting with CL re: potential Statute of Limitations issues on IJL suit	JLN	\$520	\$130
10/4/2007	0.75	Review of JB revisions to IJL complaint	JLN	\$520	\$390
10/4/2007	0.8	Review of JGB revisions to IJL complaint	JLN	\$520	\$416
10/4/2007	0.4	Discuss date to file with JLN and JGB.	CSL	\$490	\$196

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/5/2007	1.1	Discuss with JGB and review websites and potential exhibit.	CSL	\$490	\$539
10/5/2007	0.9	Reviewed additional handwritten notes from FDU	JLN	\$520	\$468
10/5/2007	0.9	Reviewed additional handwritten notes from FDU	JLN	\$520	\$468
10/6/2007	3.3	Read through IJL Book sent by L. Cudmore.	JLN	\$520	\$1,716
10/7/2007	2.1	Review complaint; review IJL's website and other docs provided by JLN.	CSL	\$490	\$1,029
10/7/2007	2.6	Reviewed IJL instructions on leaving voice message & IJL reschedules & cancellations script; reviewed IJL's New Client Questionnaire; reviewed responses to clients passing on a match; took notes re: same	JLN	\$520	\$1,352
10/8/2007	1.9	Review and edit complaint.	JGB	\$590	\$1,121
10/8/2007	3.2	Make additional changes to the complaint.	CSL	\$490	\$1,568
10/9/2007	0.2	E-mail attorneys re: complaint filing.	JGB	\$590	\$118
10/9/2007	3.9	Make changes to complaint; research franchise; discuss with civil defense attorneys possible motion to dismiss.	CSL	\$490	\$1,911
10/9/2007	1.2	Reviewed IJL's Franchise Questionnaire, IJL's EFT Form, and IJL's Financing form	JLN	\$520	\$624
10/9/2007	0.5	Mtg with CSL re: breach of contract claim.	JLN	\$520	\$260
10/9/2007	1.3	Researched McDonald's class action case law.	JLN	\$520	\$676
10/9/2007	0.8	Reviewed Package of Materials from L.Cudmore.	JLN	\$520	\$416
10/9/2007	0.3	E-mail to JGB/CSL re: findings McDonald's research & complaint exhibits.	JLN	\$520	\$156
10/9/2007	0.5	Review of IJL magazine ads as Exhibits for complaint.	JLN	\$520	\$260
10/9/2007	0.5	Reviewed McDonald's class action case law.	JLN	\$520	\$260

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/10/2007	2.1	Discuss changes to complaint with attorneys.	CSL	\$490	\$1,029
10/10/2007	4	Edit complaint and summons.	NRB	\$195	\$780
10/11/2007	4.1	Conduct additional research regarding NY Gen Bus. Law; meet with JLN and call with JGB.	CSL	\$490	\$2,009
10/11/2007	4.8	Revise complaint and summons; prepare and compile exhibits.	NRB	\$195	\$936
10/11/2007	4.8	Worked w/NRB to compile all exhibits for complaint; reviewed contents of each and every exhibit to make sure all necessary items were included; cross-referenced each exhibit with paragraphs in complaint to make sure proper sections were cited; reviewed citations to exhibits in complaint to make sure format and content was proper.	JLN	\$520	\$2,496
10/12/2007	5	Complete final revisions and edit summons and complaint.	NRB	\$195	\$975
10/12/2007	4.8	Researched case law re: fraud. inducement of contract and negligent misrepresentation under New York law	JLN	\$520	\$2,496
10/12/2007	2.8	Meeting w/CSL to discuss causes of action and pleading issues w/claims for fraud. inducement of contract and negligent misrepresentation; re-drafted these claims w/CSL; edited other paragraphs in complaint as well.	JLN	\$520	\$1,456
10/14/2007	1.1	F/u conversation with Karen Mallen re: deceptive sales tactics, mistreatment of IJL staff and commencement of lawsuit against IJL	JLN	\$520	\$572
10/15/2007	0.9	Discuss with NB; emails from and to JGB and JLN.	CSL	\$490	\$441
10/15/2007	0.9	Final discussions with JGB and JLN and final changes to the complaint before filing.	CSL	\$490	\$441

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/15/2007	1.4	Final review of complaint; discuss with paralegal re: filing and ECF issues; write draft of press release; e-mail re: class action website.	JGB	\$590	\$826
10/15/2007	2	Prepare and file complaint in court.	NRB	\$195	\$390
10/15/2007	1.3	Final review of IJL complaint with minor edits; final review of exhibits to make sure everything was in order; had complaint filed.	JLN	\$520	\$676
10/15/2007	0.1	Reviewed filed Complaint	JLN	\$520	\$52
10/16/2007	0.9	Discuss with JLN and NB regarding filing and additional Plaintiffs.	CSL	\$490	\$441
10/16/2007	2	Prepare and file complaint via ECF.	NRB	\$195	\$390
10/16/2007	1.8	Researched class action cases decided by Judge S.S.	JLN	\$520	\$936
10/17/2007	1.3	T/c w/ Mattina Rose (IJL employee ? Nashville) re: IJL's deceptive sales practices and training	JLN	\$520	\$676
10/18/2007	1	Prepare and compile materials to be served on defendants.	NRB	\$195	\$195
10/19/2007	1.4	E-mail back and forth with reporter; conduct phone conversation with reporter; e-mail to and from attorneys re: next steps; e-mail to IT person; hold conference with lawyers re: new possible class action against defendant on behalf of employees.	JGB	\$590	\$826
10/19/2007	0.5	Meeting with JGB and CSL to discuss second class action Re: IJL employees.	JLN	\$520	\$260
10/21/2007	2.4	Phone conversation and e-mails with reporters; e-mail attorneys re: next steps; e-mail class members; review website and press release; direct attorneys in procedure to deal with new class members.	JGB	\$590	\$1,416
10/21/2007	3.6	E-mail exchange with JGB, JLN and clients; call clients; discuss with outside attorney.	CSL	\$490	\$1,764

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/21/2007	0.5	Email to K.Mallen/L.Cudmore/K.Henly, Cami. C. re: separate class action for IJL employees and additional leads for same.	CSL	\$490	\$245
10/21/2007	0.3	Emails to JGB/CSL re: setting up IJL Website/Handling Client Inquiries/Creating Spreadsheet for keeping track of client contact Info.	JLN	\$520	\$156
10/21/2007	0.8	Sent emails to JGB/CSL, K.Mallen, L.Cudmore, K. Henly, Cami C. re: NY Post Article	JLN	\$520	\$416
10/21/2007	0.3	Read NY Post Article re: IJL suit.	JLN	\$520	\$156
10/21/2007	0.3	E-mail to L. Cole, former IJL employee from Alabama.	JLN	\$520	\$156
10/22/2007	0.8	Read complaint.	MDZ	\$195	\$156
10/22/2007	0.5	Contact register.com with regard to moving URL.	NRB	\$195	\$98
10/22/2007	0.5	Screen and interview four prospective IJL plaintiffs.	NRB	\$195	\$98
10/22/2007	0.5	Print and scann e-mails sent from JLN to IJL employees.	NRB	\$195	\$98
10/22/2007	3	Compile materials for handling phone calls, billing, call log of IJL callers, call log of IJL employees; print summons and complaint.	NRB	\$195	\$585
10/22/2007	0.5	Meet with CSL and MDZ to discuss logistics of handling phone calls, and keep records of each call.	NRB	\$195	\$98
10/22/2007	0.8	Meet with JLN to discuss logistics of handling phone calls and keep records of each call.	NRB	\$195	\$156
10/22/2007	0.2	Meet with CSL and NRB to discuss case.	MDZ	\$195	\$39
10/22/2007	0.6	Discuss press and class certification strategies with attorney.	JGB	\$590	\$354

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/22/2007	1.25	T/c w/Wendy Walter (IJL client ? San Fernando) re: IJL's deceptive sales tactics & lies, her overall dating experiences & her desire to join lawsuit against IJL	JLN	\$520	\$650
10/22/2007	1.1	T/c w/Gabrielle Gould (IJL client ? NYC) re: IJL's fraudulent & deceptive sales tactics, her miserable dating experiences, her desire to report IJL to BBB & her wish to join class action	JLN	\$520	\$572
10/22/2007	0.5	Meeting with NRB to discuss logistics of handling phone calls, getting contact info, asking standard questions and keeping records of each call.	JLN	\$520	\$260
10/22/2007	0.8	Meeting with CSL to discuss multiple logistical issues, including processing phone calls/e-mails, interviewing plaintiffs, interviewing employees; setting up call center; filing companion case in Fla & Cal; also discussed pros/cons of JGB on GMA.	JLN	\$520	\$416
10/22/2007	0.5	Follow-up e-mails to J.Tortula, W.Walker & G. Gould. Also, another e-mail to K. Mallen re: new class action for IJL employees.	JLN	\$520	\$260
10/22/2007	0.9	T/c w/ James Tortura, Sr. re: his son's experiences w/ IJL & possibility of joining class action. Will speak to son later today.	JLN	\$520	\$468
10/22/2007	1.2	T/c w/James Tortora Jr. (IJL client - West Palm Beach) re: IJL's fraudulent tactics & lies, dating experiences at IJL & desire to be part of class action against IJL	JLN	\$520	\$624
10/22/2007	0.3	E-mails to JGB/CSL re: other prior IJL action, and potential JGB appearance on GMA.	JLN	\$520	\$156
10/22/2007	0.5	Client interview w/G. Gould re: her experiences w/IJL in NYC.	JLN	\$520	\$260
10/22/2007	0.5	Client interview with W. Walker re: her experiences w/IJL in Century City, Calif.	JLN	\$520	\$260
10/23/2007	0.3	Draft and send client engagement letter to Tara Ficella.	WSH	\$245	\$74

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/23/2007	3.7	E-mail back and forth and phone calls back and forth to former IJL clients and employees; phone calls to members of the media; e-mails to staff re: follow up, addressing the media, and possibility of other actions.	JGB	\$590	\$2,183
10/23/2007	0.3	Screen and interview 2 prospective IJL plaintiffs.	NRB	\$195	\$59
10/23/2007	0.5	Meet with JLN re: acquiring URL's "IJL Fraud" and "IJL Class Action."	NRB	\$195	\$98
10/23/2007	0.9	Call class members; discuss with NB; e-mail JLN and JGB regarding contact with class members and former employees.	CSL	\$490	\$441
10/23/2007	0.5	Meeting with CSL re: filing FL and CA complaints; Obtained URLs with IJL Fraud and IJL Class Action	JLN	\$520	\$260
10/23/2007	2.1	T/c w/Jennifer Peck (former IJL employee ? San Diego) re: IJL's deceptive sales tactics, uniform script, training at FDU, monthly quota cycle, & overall unethical business practices	JLN	\$520	\$1,092
10/23/2007	0.8	E-mail summaries to JGB and CSL re: interview with Jennifer Peck.	JLN	\$520	\$416
10/23/2007	0.3	Meeting with NRB re: acquiring URL's.	JLN	\$520	\$156
10/24/2007	1.6	Discuss with NB and call potential class members.	CSL	\$490	\$784
10/24/2007	0.5	Mail out letter to Lisa Bruno, then fix letter, then email it out again.	WSH	\$245	\$123
10/24/2007	8.4	Meet with IJL clients; travel to and from meetings; e-mail and phone conversations with attorneys re: class issues, media contact, and next steps; phone conversations and e-mails with members of media.	JGB	\$590	\$4,956
10/24/2007	0.5	Search and print on Pacer IJL claim forms.	NRB	\$195	\$98
10/24/2007	0.1	Reviewed Order for Initial Conference set for 12/14/2007	JLN	\$520	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/24/2007	1.5	T/c w/Suzanna Grey (IJL client in NYC) re: IJL's lies, overcharging on contracts, signing two k's at same time, her overall dating experiences, names of other possible witnesses & her desire to join class action against IJL	JLN	\$520	\$780
10/24/2007	0.8	Interview with IJL client Susanna Grey.	JLN	\$520	\$416
10/24/2007	0.3	E-mail correspondence with JGB and CSL re: ABCnews.com article, handling of coverage and meeting for Oct. 26.	JLN	\$520	\$156
10/25/2007	1	Compile list of former IJL employees; add to excel list.	MDZ	\$195	\$195
10/25/2007	2.4	Phone conversation with lawyers re: media and response to defendant statements; e-mails to and from clients and class members; phone conversation with media.	JGB	\$590	\$1,416
10/25/2007	1.25	T/c Janet Steinhaus (IJL client ? NYC) re: IJL's false advertising & deceptive sales tactics, lies about matches, horrible dating experiences & desire to join suit against IJL	JLN	\$520	\$650
10/26/2007	2.4	Conference with attorney on client contact and motion to dismiss issues; e-mail to staff re: next steps; meet with class member.	JGB	\$590	\$1,416
10/26/2007	0.3	Revise IJL caller list.	NRB	\$195	\$59
10/26/2007	0.5	E-mail Bjarni Nermoe regarding ijlfraud.com and ijiclassaction.com.	NRB	\$195	\$98
10/26/2007	0.5	Contact register.com re: moving URL.	NRB	\$195	\$98
10/26/2007	0.8	Meeting with JGB to discuss strategy re: establishing role of lead counsel, possible MDL litigation, filing of other IJL lawsuits in other jurisdictions, possible third-party actions against Riverside Co.	JLN	\$520	\$416

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/26/2007	0.5	Meeting with CSL and JGB to discuss case updates, JGB appearance on Inside Edition, new URLs, status of interviews with plaintiff and former employees.	JLN	\$520	\$260
10/26/2007	0.3	Sent e-mails to J. Mallen, L. Cudmore, K. Henley, Cami C. re: updates on case and new article re: lawsuit.	JLN	\$520	\$156
10/26/2007	1.4	Discuss with JGB, JLN, and MS.	CSL	\$490	\$686
10/27/2007	1	Read through the complaint and start making comments.	WSH	\$245	\$245
10/27/2007	0.8	T/c with Lisha Lacole (IJL employee ? Nashville) re: IJL's sales practices & commission system	JLN	\$520	\$416
10/29/2007	0.7	E-mails to and from class members; edit standard interview memo.	JGB	\$590	\$413
10/29/2007	1.5	Go over the IJL complaint more and start to analyze its strengths and weaknesses.	WSH	\$245	\$368
10/29/2007	0.2	Read CSL's response re: file format and send email to JGB re: the same.	WSH	\$245	\$49
10/29/2007	0.4	Reviewed file format and send an email to CSL re: file format.	WSH	\$245	\$98
10/29/2007	0.5	Read through the complaint more.	WSH	\$245	\$123
10/29/2007	0.3	Screen and interview 2 prospective IJL plaintiffs.	NRB	\$195	\$59
10/29/2007	0.7	Update class member contact information excel sheet; create excel spreadsheet for former IJL employees.	MDZ	\$195	\$137
10/29/2007	1.25	T/c w/ Christine Huhn (New York IJL client) re: her complaints about IJL, their lies and unethical conduct, her experience at IJL, and her desire to sue IJL	JLN	\$520	\$650
10/29/2007	0.3	Reviewed new IJL information call script provided by CSL.	JLN	\$520	\$156

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/29/2007	0.8	Interviewed former IJL client C. Huhn.	JLN	\$520	\$416
10/29/2007	1.3	T/c w/Sandra Burga (IJL client from LA) re: IJL's deceptive sales practices & procedures, & her overall miserable experience w/IJL & her willingness to become one of the named plaintiffs in the lawsuit	JLN	\$520	\$676
10/30/2007	1.6	Meet with class member to discuss her experience; e-mails to and from attorney re: setting up interview procedure going forward; phone conference with attorney re: potential lead counsel issues and client follow ups.	JGB	\$590	\$944
10/30/2007	0.9	Call to potential class members and discuss with NB and MZ.	CSL	\$490	\$441
10/30/2007	0.3	Screen and interview 2 prospective IJL plaintiffs.	NRB	\$195	\$59
10/30/2007	1.1	F/u t/c w/Christine Huhn re: IJL experience & contact info for other witnesses & names of IJL employees	JLN	\$520	\$572
10/30/2007	1.1	Follow-up conversation w/S. Burga (IJL client Century City) re: other possible witnesses to speak with, further details re: lies she was told & her complaints made to IJL Corporate	JLN	\$520	\$572
10/30/2007	0.3	Placed calls to former IJL clients M. Iken and S. Burga. Sent e-mail to JGB and CSL re: update of conversation with C. Huhn as 9-11 widow; sent another e-mail to JGB and CSL re: IJL's new client welcome call script.	JLN	\$520	\$156
10/30/2007	1.4	T/c w/Monica Iken (New York IJL client) re: her experiences at IJL and IJL's deceptive sales practices	JLN	\$520	\$728
10/30/2007	1.4	Follow-up conversation w/Monica Iken re: lies & deceptive sales tactics of IJL, & experiences of seven of her friends who joined IJL	JLN	\$520	\$728

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/30/2007	1.2	T/c Sharon Probst (Florida IJL client) re: IJL's fraudulent and high- pressured sales practices & her desire to sue IJL to get money back	JLN	\$520	\$624
10/30/2007	0.8	Interview with former IJL client, S. Burga.	JLN	\$520	\$416
10/31/2007	1.2	Draft e-mail, calls to class members and discussions with WSH, JGB and MZ.	CSL	\$490	\$588
10/31/2007	1.7	Edit language for e-mail to clients; discuss with associate method of follow up interviews; edit interview memoranda; conference with attorney re: lead counsel issues.	JGB	\$590	\$1,003
10/31/2007	1.2	Work on client/employee spreadsheets.	MDZ	\$195	\$234
10/31/2007	0.2	Correct and send out IJL memos to CSL, JN, JGB, MZ.	WSH	\$245	\$49
10/31/2007	0.4	Meet with JGB and talk about interview memoranda and about what needs to be done.	WSH	\$245	\$98
10/31/2007	0.4	Make changes to intake memo and email to JGB.	WSH	\$245	\$98
10/31/2007	1.3	F.u t/c w/Sharon Probst re: case status, next steps for moving forward, possible other witnesses, & names of people she dealt with	JLN	\$520	\$676
11/2/2007	1	Send out mass e-mail to IJL clients re: updates.	MDZ	\$195	\$195
11/2/2007	2	Work on memo addressing strengths and weaknesses of the IJL complaint.	WSH	\$245	\$490
11/4/2007	0.3	Sent e-mail to S. Gray, former IJL client; left VM message for Monica I., former IJL client. Left VM message for Sharon Probst, former IJL client in FL.	JLN	\$520	\$156
11/5/2007	0.8	Go through IJL client spreadsheet and make changes, and re-organize.	WSH	\$245	\$196
11/5/2007	1.5	Send emails to and correspond with potential IJL class members.	WSH	\$245	\$368

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/5/2007	0.4	Make changes/update excel spreadsheets for employees and clients.	MDZ	\$195	\$78
11/6/2007	0.3	Review client issues; e-mail to and from clients and staff; review next steps e-mail; e-mail to staff re; next steps including fact investigation.	JGB	\$590	\$177
11/6/2007	1	Email IJL members to confirm a time to speak over the telephone.	WSH	\$245	\$245
11/7/2007	0.2	Prepare for and telephone Joann for an interview.	WSH	\$245	\$49
11/7/2007	0.3	Send email to Sandra Burga enclosing the engagement letter.	WSH	\$245	\$74
11/7/2007	0.3	Conference with JLN re: questions from a class member.	WSH	\$245	\$74
11/7/2007	0.5	Follow up with conversation by filling out memo for Burga.	WSH	\$245	\$123
11/7/2007	0.6	Speak with Sandra Burga re: her experience with IJL.	WSH	\$245	\$147
11/7/2007	0.2	Make corrections to IJL client list and post to PA.	WSH	\$245	\$49
11/7/2007	0.2	Attempt to call Mark Tiburzio.	WSH	\$245	\$49
11/7/2007	1	Correspond with IJL class members to arrange a time to speak over the phone.	WSH	\$245	\$245
11/7/2007	0.2	Correspond with JGB over meeting on Monday in IJL case.	WSH	\$245	\$49
11/7/2007	0.2	Correspond with Sandra over email following conversation.	WSH	\$245	\$49
11/7/2007	0.3	Meeting with WSH re: handling specific questions from IJL prospective class members.	JLN	\$520	\$156
11/8/2007	0.2	Correspond with Heather to setup a time to discuss IJL.	WSH	\$245	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/8/2007	0.2	Attempt to call Deb in IJL case.	WSH	\$245	\$49
11/8/2007	0.2	Attempt to call Lisa Bruno to interview her for IJL case.	WSH	\$245	\$49
11/8/2007	0.2	Make corrections/additions to the IJL client list.	WSH	\$245	\$49
11/8/2007	0.1	Discuss phone call with Karen with CSL.	WSH	\$245	\$25
11/8/2007	1	Correspond with Karen Malak and write up the memo on the phone interview.	WSH	\$245	\$245
11/8/2007	0.5	Meeting with CSL re: defendant's request for extension of time to answer or move; research re: def. attorney and def. firm; discussion of strategy re: submitting response.	JLN	\$520	\$260
11/9/2007	0.5	Write up what Lisa Bruno said re: IJL experience.	WSH	\$245	\$123
11/9/2007	0.5	Talk with Lisa Bruno about IJL.	WSH	\$245	\$123
11/9/2007	0.2	Correspond with Lisa Bruno about when to reschedule a time to speak over the phone.	WSH	\$245	\$49
11/9/2007	0.2	Discuss with CSL some of the interviews for IJL.	WSH	\$245	\$49
11/9/2007	0.2	Prepare to discuss with Tara facts of IJL.	WSH	\$245	\$49
11/9/2007	0.1	Attempt to return call to Catherine.	WSH	\$245	\$25
11/9/2007	0.2	Prepare and attempt to call Catherine Hodgkiss.	WSH	\$245	\$49
11/9/2007	0.8	Interview with Mark Tiburzio and subsequent memo.	WSH	\$245	\$196
11/9/2007	1	Correspond with Tara and follow up by writing her an email and filing out the memo.	WSH	\$245	\$245
11/9/2007	0.1	E-mail copy of complaint to Bjarni Nermoe.	MDZ	\$195	\$20
11/9/2007	0.1	Fax stipulation to Donna; update excel spreadsheet of clients.	MDZ	\$195	\$20

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/9/2007	0.3	E-mail exchanges with CSL re: other potential class members joining suit and updates on status of case.	JLN	\$520	\$156
11/10/2007	0.1	Updated Excel spreadsheet of clients.	MDZ	\$195	\$20
11/12/2007	1.2	Conference with lawyers re: client follow up and new potential class action issues; review of e-mails to clients; e-mail to and from co-counsel re: dominion and control issues.	JGB	\$590	\$708
11/12/2007	0.5	Sit down and discuss with John and Jon the status of the IJL case.	WSH	\$245	\$123
11/12/2007	0.1	Correspond with Gaby about rescheduling time to discuss IJL.	WSH	\$245	\$25
11/12/2007	0.8	Meeting with JGB and WSH re: updates on IJL lawsuit, including discussion of media coverage, client and employee follow-up, contacts with lead plaintiff E. Packman, adjusted date for anticipated MTD, attendance of Rule 16 conference on December 14, and drafted complaint for class action on behalf of IJL employees.	JLN	\$520	\$416
11/13/2007	0.1	Correspond with Gaby re: time to talk.	WSH	\$245	\$25
11/13/2007	0.3	Call to Shear to set up a time to talk (Wed at 12:30 p.m.).	WSH	\$245	\$74
11/13/2007	0.1	Correspond with Gaby to reschedule a time to discuss IJL.	WSH	\$245	\$25
11/14/2007	0.1	Call clerk's office re: adding CSL to ECF e-mail list and discuss with JGB and WSH.	MDZ	\$195	\$20
11/14/2007	0.5	Interview Gaby for IJL.	WSH	\$245	\$123
11/14/2007	0.1	Send interview memo to JLN.	WSH	\$245	\$25
11/14/2007	0.6	Call to Robert Shear re: a different possible dating class action.	WSH	\$245	\$147

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/14/2007	0.1	Email to Catherine H. re: scheduling a time to discuss IJL.	WSH	\$245	\$25
11/14/2007	0.3	Read over emails from Lisa Bruno and respond.	WSH	\$245	\$74
11/14/2007	0.2	E-mail CSL and other staff re: filing of stipulation contrary to stated wishes re: time extension.	JGB	\$590	\$118
11/14/2007	0.2	Correspond with Janet and Catherine re: scheduling a time to speak over the phone.	WSH	\$245	\$49
11/15/2007	0.5	Prepare Notice of Appearance for CSL.	MDZ	\$195	\$98
11/15/2007	0.1	Update IJL class member excel sheet.	MDZ	\$195	\$20
11/15/2007	0.2	Attempt to call Heather for IJL.	WSH	\$245	\$49
11/19/2007	0.5	Speak with Joanne for the client interview.	WSH	\$245	\$123
11/19/2007	0.1	Update excel spreadsheet of class members.	MDZ	\$195	\$20
11/20/2007	0.1	E-mail plaintiff re: contact info and meeting.	JGB	\$590	\$59
11/20/2007	1.75	Finished IJL's Guide to dating in America	JLN	\$520	\$910
11/26/2007	0.1	Update excel spreadsheet.	MDZ	\$195	\$20
11/27/2007	1.1	Meet with client to discuss issues; review earlier e-mails and client/class status.	JGB	\$590	\$649
11/28/2007	0.8	Discussion with Heather Wexler over the phone.	WSH	\$245	\$196
11/28/2007	0.2	Read email from Janet and respond to Janet, a potential client.	WSH	\$245	\$49
11/28/2007	0.3	Email to Jennifer Hayes.	WSH	\$245	\$74
11/29/2007	1.2	Telephone interview w/Mark Whitfield (IJL client ? Denver) re: overall experiences at IJL and deceptive sales tactics employed by IJL staff to get him to sign	JLN	\$520	\$624
11/29/2007	0.1	Update excel spreadsheet of class members.	MDZ	\$195	\$20

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/29/2007	0.2	Correspond with Janet to setup a time to discuss IJL.	WSH	\$245	\$49
11/30/2007	0.1	Discuss scheduling issues with CSL including need to move CMC.	JGB	\$590	\$59
11/30/2007	0.6	Interview with Janet regarding IJL and Harry & Sally.	WSH	\$245	\$147
12/2/2007	0.9	F/u conversation w/ M. Whitfeld possible willingness to class rep & responsibilities should opportunity arise	JLN	\$520	\$468
12/4/2007	0.2	Write JGB about getting back to him tomorrow on the IJL updates.	WSH	\$245	\$49
12/4/2007	0.5	Work with MZ on the IJL monthly update.	WSH	\$245	\$123
12/4/2007	0.4	Discuss with WSH re: IJL updates to clients; composed e-mail template; e-mails with JGB re: procedures etc.	MDZ	\$210	\$84
12/4/2007	0.1	Follow up with Jennifer Hays to schedule a time to discuss IJL.	WSH	\$245	\$25
12/5/2007	0.2	Discuss with JLN about rescheduling time to discuss.	WSH	\$245	\$49
12/5/2007	0.5	Discuss with MZ about filing procedures.	WSH	\$245	\$123
12/5/2007	0.2	Discuss with JGB about filing for IJL.	WSH	\$245	\$49
12/6/2007	0.2	Follow up with IJL client.	WSH	\$245	\$49
12/6/2007	0.1	Meet with JGB and WSH to discuss IJL monthly updates.	MDZ	\$210	\$21
12/7/2007	0.3	Discuss with JN about IJL employees.	WSH	\$245	\$74
12/7/2007	0.1	Discuss with JN about meeting to discuss IJL employees lawsuit.	WSH	\$245	\$25
12/7/2007	0.4	Discuss with MZ about IJL naming formats.	WSH	\$245	\$98

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/7/2007	0.2	Work on saving the documents to PA.	WSH	\$245	\$49
12/7/2007	0.5	Meeting with CSL re: anticipated motions/upcoming court conference on Dec. 14/general case management strategy	JLN	\$520	\$260
12/7/2007	0.3	Meeting with WSH re: preparing questionnaire for IJL employees and updating list for same.	JLN	\$520	\$156
12/9/2007	0.3	E-mailed to IJL employee and CSL and reviewed documents sent by her.	JLN	\$520	\$156
12/9/2007	0.3	E-mailed to IJL employee and CSL and reviewed documents sent by her.	JLN	\$520	\$156
12/10/2007	0.2	Follow up with scheduling a time to speak with Jennifer Hayes.	WSH	\$245	\$49
12/10/2007	0.1	Communicate with Jennifer Hayes about scheduling a time to speak.	WSH	\$245	\$25
12/10/2007	0.1	Communicate with Lisa Bruno following her email.	WSH	\$245	\$25
12/11/2007	0.3	Construct memo from interview with Jennifer Hayes.	WSH	\$245	\$74
12/11/2007	1	Phone call with Jennifer Hayes and follow up.	WSH	\$245	\$245
12/11/2007	0.1	Discussed with WSH protocol for interviewing clients.	MDZ	\$210	\$21
12/11/2007	0.1	Update class member excel sheet.	MDZ	\$210	\$21
12/11/2007	0.2	Meet with JN about IJL employee class action.	WSH	\$245	\$49
12/11/2007	0.2	Follow up email to potential IJL client.	WSH	\$245	\$49
12/11/2007	0.1	Send follow-up email to IJL class member.	WSH	\$245	\$25
12/11/2007	0.1	Get response from potential IJL class member.	WSH	\$245	\$25
12/11/2007	0.2	Email potential IJL class member.	WSH	\$245	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/11/2007	0.2	Discuss with MZ about IJL client list.	WSH	\$245	\$49
12/11/2007	0.3	Meeting with WSH re: issue check list for IJL employee interviews and protocols to be followed when conducting the same.	JLN	\$520	\$156
12/11/2007	0.3	E-mail correspondence between JLN, JGB and CSL re: strategy on issues that might be raised at initial conference on Dec. 14.	JLN	\$520	\$156
12/11/2007	1.1	E-mail correspondence & follow-up phone conversation with Andrew Woolf (IJL client in LA) re: his experiences in the IJL office and specific persons who would have knowledge of sales tactics used	JLN	\$520	\$572
12/11/2007	0.5	Multiple e-mails to CSL re: relevant issues of IJL employees; receipt of IJL employee handbook; review of same.	JLN	\$520	\$260
12/11/2007	0.8	Interview with former IJL client, Andrew Woolf; reviewed two faxes he sent to IJL.	JLN	\$520	\$416
12/12/2007	0.2	Followed-up with A. Woolf via phone.	MDZ	\$210	\$42
12/12/2007	0.4	Spoke with WSH re: phone interviews with potential clients; phoned A. Woolf.	MDZ	\$210	\$84
12/12/2007	0.1	Call back to Heather Wexler. Left a message.	WSH	\$245	\$25
12/12/2007	0.1	Listen to voicemail from Heather Wexler.	WSH	\$245	\$25
12/12/2007	2.25	Read IJL Nashville Employee Handbook (provided by C.Craig); took notes re: same	JLN	\$520	\$1,170
12/13/2007	0.3	Discuss with MZ about emailing out to clients the engagement letter and follow-up.	WSH	\$245	\$74
12/13/2007	0.1	Called Janeen Cameron, potential client-- left a voicemail.	MDZ	\$210	\$21
12/13/2007	0.1	Call to Mary-Susan Snyder- will call back again.	MDZ	\$210	\$21
12/13/2007	0.1	Updated excel spreadsheet of potential clients.	MDZ	\$210	\$21

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/13/2007	1.8	Preparation for initial conf. before Judge Stein tomorrow; review of all case materials, pleadings, AG findings & AODs, etc for conference tomorrow	JLN	\$520	\$936
12/13/2007	0.8	Reviewed file in preparation for initial conference.	JLN	\$520	\$416
12/13/2007	0.3	Reviewed e-mails from CSL and summary of work-related IJL issues for C/A on behalf of IJL employees.	JLN	\$520	\$156
12/13/2007	2	Attended conference; met with defense counsel; worked out discovery schedule; discussed case management issues; reported back to Judge; spoke with CSL re: conference and upcoming discovery.	JLN	\$520	\$1,040
12/14/2007	0.1	Follow up email to Mattina.	WSH	\$245	\$25
12/14/2007	0.1	Initial email to Mattina.	WSH	\$245	\$25
12/14/2007	0.1	Follow up email to Nicole Davis.	WSH	\$245	\$25
12/14/2007	0.1	Initial email to Nicole Davis.	WSH	\$245	\$25
12/14/2007	0.1	Follow up with Jane Brown.	WSH	\$245	\$25
12/14/2007	0.1	Initial email to Jane Brown.	WSH	\$245	\$25
12/14/2007	0.1	Follow up email to Lori Millon.	WSH	\$245	\$25
12/14/2007	0.1	Initial email to Lori Millon.	WSH	\$245	\$25
12/14/2007	0.1	Email to Kristen Bailey confirming Monday morning conversation.	WSH	\$245	\$25
12/14/2007	0.1	Follow up email with Kristen Bailey regarding scheduling.	WSH	\$245	\$25
12/14/2007	0.1	Email to Kristen Bailey initiating contact.	WSH	\$245	\$25
12/14/2007	0.5	Search for and print out relevant documents and emails in the IJL case.	WSH	\$245	\$123

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/14/2007	0.1	Update JN about the IJL employees action.	WSH	\$245	\$25
12/14/2007	0.2	Post-conf. discussion w/John Doody re: case & steps for moving forward	JLN	\$520	\$104
12/14/2007	0.4	Post-conf. discussion w/CSL re: conference, discussion with def. counsel & next steps for moving forward	JLN	\$520	\$208
12/14/2007	0.4	Attended initial conference before Judge Stein	JLN	\$520	\$208
12/15/2007	0.1	Communicate with potential client in IJL employees action.	WSH	\$245	\$25
12/15/2007	0.1	Communicate with potential client in IJL employees action.	WSH	\$245	\$25
12/16/2007	0.1	Email back to Rhonda in employees action.	WSH	\$245	\$25
12/17/2007	1.3	discuss with WSH and e-mail to CSL and JN next steps in case; review answer	JGB	\$590	\$767
12/17/2007	0.2	Discuss with JB about the IJL naming and employee class action.	WSH	\$245	\$49
12/17/2007	0.1	Discuss with Kristen Bailey about rescheduling time to talk about IJL.	WSH	\$245	\$25
12/17/2007	0.5	Conversation with Lori Demothe.	WSH	\$245	\$123
12/17/2007	0.1	Update excel spreadsheet of IJL employees.	MDZ	\$210	\$21
12/17/2007	0.2	Read over Nicole Davis's email and respond to her.	WSH	\$245	\$49
12/17/2007	0.1	Follow up with MZ about adding names to employees list.	WSH	\$245	\$25
12/17/2007	0.1	Attempt to call Kristen Bailey.	WSH	\$245	\$25
12/17/2007	0.2	Reviewed Answer to Complaint filed by IJL	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/18/2007	0.5	Conversation with Rhonda regarding the employees lawsuit.	WSH	\$245	\$123
12/18/2007	0.5	Phone call with Kristen Bailey.	WSH	\$245	\$123
12/18/2007	0.1	Attempt to get in touch with Kristen Bailey.	WSH	\$245	\$25
12/18/2007	0.1	Attempt to talk to Nicole Davis.	WSH	\$245	\$25
12/18/2007	0.5	Talk to Lisha Cole.	WSH	\$245	\$123
12/19/2007	0.3	Reviewed correspondence b/w Janeen Cameron & Anna Anderson IJL franchise owner ? Denver) re: her complaints about IJL & forwarding of complaint to BBB	JLN	\$520	\$156
1/2/2008	0.3	Contact three potential class members via e-mail regarding obtaining their phone numbers and setting up interviews.	MDZ	\$225	\$68
1/3/2008	0.1	Left voicemail for Christine Rodriguez.	MDZ	\$225	\$23
1/3/2008	2.2	T/c Cami Craig (IJL Sales Nashville) re: IJL's deceptive practices & lies & corporate training for same	JLN	\$520	\$1,144
1/4/2008	1.1	Meet with JGB and JLN and follow up discussion.	CSL	\$520	\$572
1/4/2008	1.5	Lunch meeting with CSL and JLN re: class certification, discovery, and trial strategy; e-mail to MDZ and WSH re: communication and follow up issues.	JGB	\$620	\$930
1/4/2008	0.1	Update excel client spreadsheet.	MDZ	\$225	\$23
1/4/2008	1.9	F/u t/c w/C. Craig re: IJL's practices, training, other potential employee-witnesses, IJL's false job postings, former IJL client arrested for rape	JLN	\$520	\$988
1/7/2008	0.9	F/u t/c w/ C Craig re: potential willingness to testify in this action re: IJL's deceptive sales practices, training, etc.	JLN	\$520	\$468

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/7/2008	0.1	Touch base with JLN regarding IJL employees class action.	WSH	\$260	\$26
1/8/2008	0.1	Correspond with Jon Norinsberg about IJL.	WSH	\$260	\$26
1/11/2008	0.1	Discuss updates with JGB and CSL during weekly session.	WSH	\$260	\$26
1/11/2008	0.4	Work on IJL employees' memoranda.	WSH	\$260	\$104
1/11/2008	0.3	Discussion of client contact procedures with MDZ.	JGB	\$620	\$186
1/11/2008	0.1	Write e-mail to C. Rodriguez recognizing receipt of engagement letter.	MDZ	\$225	\$23
1/14/2008	0.1	Conversation with press member regarding IJL.	WSH	\$260	\$26
1/14/2008	0.2	Correspond with JGB about IJL.	WSH	\$260	\$52
1/15/2008	0.3	Work on IJL employees' memos.	WSH	\$260	\$78
1/15/2008	0.1	Follow-up e-mail from C. Craig re: IJL's employment agreement	JLN	\$520	\$52
1/16/2008	0.2	Compose memo regarding IJL employees lawsuit.	WSH	\$260	\$52
1/17/2008	0.1	Email Jon Norinsberg about IJL memos.	WSH	\$260	\$26
1/17/2008	1	Work on IJL employee interview memos.	WSH	\$260	\$260
1/18/2008	0.1	Send e-mail to E. Packman to get complete contact information.	MDZ	\$225	\$23
1/18/2008	0.1	Update IJL Class Members excel spreadsheet.	MDZ	\$225	\$23
1/22/2008	0.1	Update excel spreadsheet of class members.	MDZ	\$225	\$23
1/22/2008	0.1	Leave voicemail for Abigail Reyes to set-up a time to interview her.	MDZ	\$225	\$23

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/22/2008	1.6	Assisted in preparation of plaintiff's initial disclosures, including identification of parties, class members, IJL employee-informants & relevant docs. obtained from IJL former employees.	JLN	\$520	\$832
1/23/2008	0.8	Meet with JLN and research class certification.	CSL	\$520	\$416
1/23/2008	1.4	T/c interview w/Christine Waldick (IJL client ? San Jose Office) re: IJL's deceptive sales tactics her overall dating experiences at IJL, & possibility of joining class action	JLN	\$520	\$728
1/24/2008	1.4	Review of initial disclosures; discuss with JLN regarding class cert motion, discuss with JGB regard class cert, and trial plan.	CSL	\$520	\$728
1/24/2008	0.1	Correspond with Nicole about IJL employees.	WSH	\$260	\$26
1/24/2008	0.3	Correspond with Nicole about IJL employees class action.	WSH	\$260	\$78
1/24/2008	0.3	Correspond with MZ about IJL communications.	WSH	\$260	\$78
1/24/2008	0.4	Make photocopies of cases.	MDZ	\$225	\$90
1/24/2008	6.2	Draft, review and edit initial disclosures multiple times; compile and review all documents necessary for inclusion in initial disclosures; label each document individually; compile list of all potential witnesses; divide witnesses into four separate categories for initial disclosures; review GBL §349(h) for assertion of treble damages claim on behalf of NY plaintiff.	NRB	\$195	\$1,209
1/25/2008	0.4	Meetings discussing general plan.	CSL	\$520	\$208
1/25/2008	0.2	Review trial plan for IJL as drafted by CSL.	WSH	\$260	\$52
1/30/2008	0.2	E-mail JGB and discuss appropriate e-mail response to J. Watson.	MDZ	\$225	\$45
1/30/2008	0.8	Discuss class certification issues with JLN; e-mail to JLN and CSL.	JGB	\$620	\$496

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/30/2008	0.2	E-mail exchanges w/C. Craig re: her correspondence with her boss, Alan Weiss, names of other potential workers in Nashville office, and potential claims under FLSA	JLN	\$520	\$104
1/31/2008	0.5	Spoke to WSH re: two e-mails received; e-mailed new potential class member Carrie Crockett; updated excel.	MDZ	\$225	\$113
1/31/2008	0.6	Discuss class certification and related issues with CSL and co-counsel.	JGB	\$620	\$372
1/31/2008	0.1	E-mail new potential class member, Lisa, to ask for her phone number and a convenient time to interview her.	MDZ	\$225	\$23
1/31/2008	4.1	Review information for class certification.	CSL	\$520	\$2,132
1/31/2008	1.1	Correspond with potential IJL clients.	WSH	\$260	\$286
2/1/2008	1.1	Review class cert case law.	CSL	\$520	\$572
2/1/2008	0.4	Respond to IJL member's email.	WSH	\$260	\$104
2/1/2008	0.3	Email potential IJL client.	WSH	\$260	\$78
2/5/2008	0.1	E-mail back and forth with CSL.	JGB	\$620	\$62
2/5/2008	0.1	Reviewed Rule 7.1 Corporate Disclosure Statement Identifying Riverside Microcap Fund I LP and IJL Holding Corporation and Its Just Lunch Holding, LLC as Corporate Parent	JLN	\$520	\$52
2/5/2008	0.3	Correspond with IJL client about joining the class.	WSH	\$260	\$78
2/6/2008	0.1	Conversation with John about continuation of fraud and IJL's liability.	WSH	\$260	\$26
2/6/2008	0.4	Conversation with potential IJL client.	WSH	\$260	\$104
2/7/2008	0.2	Photocopy disclosures.	MDZ	\$225	\$45

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/10/2008	2.25	Reviewed Franchise Agreement between IJL & Vador Enterprises, Inc. (Harry & Sally); took notes re same.	JLN	\$520	\$1,170
2/10/2008	0.1	Read letter sent by K.McBride to IJL Austin offices re: complaints against IJL	JLN	\$520	\$52
2/11/2008	0.2	E-mail to and from JLN and CSL re: class cert and upcoming meeting.	JGB	\$620	\$124
2/12/2008	0.2	PDF'd websites re: The Riverside Company.	MDZ	\$225	\$45
2/12/2008	1.2	T/c interview with Mara Gurvets (IJL Client ? Fla.) Re: lies told by IJL, her miserable dating experiences at IJL & desire to get refund	JLN	\$520	\$624
2/12/2008	2.4	Finished review of IJL's Director's Manual; took notes re: same	JLN	\$520	\$1,248
2/12/2008	1.3	Meet with JGN and JLN regarding what to do next.	CSL	\$520	\$676
2/13/2008	0.4	Discuss with JLN regarding whether or not class court motion should go forward or we should finish discovery; set up of meeting with him for next week on discovery.	CSL	\$520	\$208
2/13/2008	0.1	Discuss class cert brief with CSL.	WSH	\$260	\$26
2/15/2008	0.2	Follow up discussion with Norinsberg about IJL.	WSH	\$260	\$52
2/15/2008	0.3	Talk on the phone with IJL client.	WSH	\$260	\$78
2/15/2008	0.5	Write a follow-up email to Diana Mai; interview her; speak to WSH and write e-mail asking question about anonymity to JGB.	MDZ	\$225	\$113
2/15/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
2/15/2008	0.1	E-mail D. Mai about setting up interview.	MDZ	\$225	\$23
2/15/2008	1.7	Started review of IJL's FDU Coordinator's Manual	JLN	\$520	\$884
2/18/2008	1.4	Finished review of IJL's Coordinator's Manual	JLN	\$520	\$728

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/19/2008	0.1	Correspond with MZ about calling back the IJL person.	WSH	\$260	\$26
2/19/2008	0.1	Correspond with MZ about IJL engagement letter.	WSH	\$260	\$26
2/19/2008	0.4	Reviewed IJL's insurance coverage, insurance docs., & policy declaration re: during relevant time period.	JLN	\$520	\$208
2/21/2008	0.3	Create engagement letter for Janeen Cameron; e-mail to WSH.	MDZ	\$225	\$68
2/21/2008	0.9	Interview Abigail Reyes; speak with WSH; create engagement letter; send out follow-up e-mail to her with engagement letter; update excel spreadsheet.	MDZ	\$225	\$203
2/21/2008	0.3	Look into what's involved with IJL.	WSH	\$260	\$78
2/22/2008	0.3	Review issue involved in class certification.	JGB	\$620	\$186
2/25/2008	0.2	E-mail to and from attorneys re: discovery demands.	JGB	\$620	\$124
2/25/2008	0.2	E-mail to and from JLN re: discovery dispute.	JGB	\$620	\$124
2/26/2008	0.6	Send e-mails to and from WSH and JLN re: initial discovery demands.	JGB	\$620	\$372
2/26/2008	0.2	Speak with WSH re: text of e-mail; followed-up with Diana Mai re: anonymity of IJL class action.	MDZ	\$225	\$45
2/26/2008	0.2	Correspond with JGB about sending files to JLN.	WSH	\$260	\$52
2/26/2008	0.7	Go through all discovery files to send to JLN.	WSH	\$260	\$182
2/26/2008	0.2	Work with Michael on installing WordPerfect.	WSH	\$260	\$52
2/27/2008	6.2	Drafted and revised "Attorney's Eyes Only" protective order.	NRB	\$195	\$1,209
2/27/2008	0.4	Work on getting documents to Nicole in IJL.	WSH	\$260	\$104
2/27/2008	0.2	review protective order; e-mail to JLN and CSL	JGB	\$620	\$124

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/28/2008	0.2	Make minor revisions to protective order and then send same to N.Moussa for review.	NRB	\$195	\$39
3/3/2008	0.3	Discuss IJL and sending out emails.	WSH	\$260	\$78
3/3/2008	3.5	Start drafting requests for admissions on liability issues in case.	NRB	\$195	\$683
3/3/2008	0.4	Speak to JGB re: creating update e-mail for all class members; discuss draft; send e-mail to all class members and CSL.	MDZ	\$225	\$90
3/3/2008	0.1	E-mail Jon Norinsberg re: A. Woolf client follow-up.	MDZ	\$225	\$23
3/3/2008	0.3	Discuss with MDZ communication to go to class members; phone conversation with class member.	JGB	\$620	\$186
3/3/2008	0.1	Update interview memorandum for Abigail Reyes and update excel spreadsheet.	MDZ	\$225	\$23
3/3/2008	0.2	E-mail Sandra Burga back re: the process so far and where the suit is headed; e-mail follow-up to WSH.	MDZ	\$225	\$45
3/3/2008	0.1	E-mail Janeen Cameron and send her an engagement letter.	MDZ	\$225	\$23
3/3/2008	0.1	E-mail WSH and JGB re: getting back to 2 clients who e-mailed me.	MDZ	\$225	\$23
3/4/2008	0.5	Interview Brad.	MDZ	\$225	\$113
3/4/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
3/4/2008	0.9	Discuss with CSL and JLN discovery and class certification strategy.	JGB	\$620	\$558

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/4/2008	2.3	Lunch meeting with JGB and CSL to discuss multiple issues in case, including protective order, motion to compel, first set of doc. demands, deposition scheduling and motion for certification.	NRB	\$195	\$449
3/4/2008	6.5	Finish drafting requests for admissions; start drafting interrogatories and document requests, and make multiple revisions to same; review draft of dep. notices.	NRB	\$195	\$1,268
3/4/2008	0.1	E-mail WSH re: IJL class action e-mail.	MDZ	\$225	\$23
3/4/2008	1.7	Meeting on case.	CSL	\$520	\$884
3/5/2008	8.2	Continue drafting first set of discovery demands; make multiple revisions, edits and additions to interrogatories, requests for admissions and document requests.	NRB	\$195	\$1,599
3/6/2008	0.1	Review IJL documents and discuss with Nicole.	WSH	\$260	\$26
3/6/2008	0.2	Create engagement letter, e-mail follow-up message to B. Berkowitz with Complaint and engagement letter.	MDZ	\$225	\$45
3/6/2008	0.3	Scan in all discovery documents.	MDZ	\$225	\$68
3/6/2008	0.2	Further discussion with MZ about file saving.	WSH	\$260	\$52
3/6/2008	0.2	Discuss with MZ about saving the IJL file names.	WSH	\$260	\$52
3/7/2008	0.3	Create engagement letter; send A. Fahl copy of letter and follow-up e-mail.	MDZ	\$225	\$68
3/7/2008	0.4	Interview potential class member, Amy Fahl.	MDZ	\$225	\$90
3/7/2008	0.1	Update excel.	MDZ	\$225	\$23
3/10/2008	0.2	Review protective order; e-mails to JLN and Burstyn re: follow up.	JGB	\$620	\$124
3/10/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/10/2008	0.1	Followed-up with Ange Zhou re: discrimination lawsuit.	MDZ	\$225	\$23
3/10/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
3/10/2008	0.5	Interview potential class members, Ange Zhou; speak to WSH and CSL re: potential discrimination suit against IJL.	MDZ	\$225	\$113
3/11/2008	0.2	Discuss scheduling with CSL.	WSH	\$260	\$52
3/13/2008	0.2	Spoke to A. Woolf; follow-up e-mail with JLN.	MDZ	\$225	\$45
3/13/2008	2.8	Researched Riverside Microcap fund (owner of IJL); printed out volume of all materials relating to Riverside; highlighted same	JLN	\$520	\$1,456
3/13/2008	0.1	Reviewed Stipulated Protective Order regarding procedures to be followed for the handling of confidential material	JLN	\$520	\$52
3/14/2008	0.1	Discuss class cert motion with CSL.	JGB	\$620	\$62
3/17/2008	0.1	E-mail message from A. Woolf to JLN.	MDZ	\$225	\$23
3/17/2008	4.6	Draft class cert motion.	CSL	\$520	\$2,392
3/18/2008	4.7	Draft class cert motion.	CSL	\$520	\$2,444
3/18/2008	0.1	Talk to CSL about class certification.	WSH	\$260	\$26
3/19/2008	0.1	Receive instructions on class cert motion.	SHJ	\$310	\$31
3/19/2008	0.2	Discuss with Sue and CSL about going through the IJL class certification brief.	WSH	\$260	\$52
3/19/2008	3.7	Discussions with JGB regarding managing work on case, meetings with WSH and SJ, drafting of documents.	CSL	\$520	\$1,924
3/20/2008	2.9	Additional drafting of the class certification motion.	CSL	\$520	\$1,508

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/25/2008	0.2	E-mail potential class member; update excel spreadsheet.	MDZ	\$225	\$45
3/26/2008	0.3	Legal research re: successful class certification motions in SDNY.	NRB	\$195	\$59
3/27/2008	0.1	E-mail JLN re: contacting potential class member.	MDZ	\$225	\$23
3/27/2008	0.4	Discussions regarding templates for class cert with JLN.	CSL	\$520	\$208
3/28/2008	0.1	Coordinate with MZ about contacting the individual listed on the sheet.	WSH	\$260	\$26
3/28/2008	0.1	Discuss with CSL the status of everything for the IJL case.	WSH	\$260	\$26
3/28/2008	0.1	E-mail JLN re: potential client.	MDZ	\$225	\$23
3/31/2008	0.4	E-mail exchanges setting up a meeting.	CSL	\$520	\$208
3/31/2008	0.8	E-mails to and from JLN and CSL re: class certification issues.	JGB	\$620	\$496
4/1/2008	0.7	Review class action complaint; list items for research.	SHJ	\$310	\$217
4/1/2008	0.3	Skim motion for class certification; assemble docs for review.	SHJ	\$310	\$93
4/1/2008	0.3	View docs under Matters; searched for folder; emailed MDZ for printouts.	SHJ	\$310	\$93
4/1/2008	0.2	Print out documents for SHJ.	MDZ	\$225	\$45
4/1/2008	1.2	Discussion on next steps in the case including who is to do depositions and time to file class cert motion.	CSL	\$520	\$624
4/1/2008	1.1	Conference with JLN and CSL re: class certification, complaint, and discovery issues.	JGB	\$620	\$682
4/2/2008	0.4	Review statement of facts in complaint.	SHJ	\$310	\$124

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/3/2008	1.1	Review of research for Class Cert.	CSL	\$520	\$572
4/3/2008	0.2	Case meeting on IJL.	WSH	\$260	\$52
4/4/2008	1.3	Review additional second circuit cases for class cert motion.	CSL	\$520	\$676
4/4/2008	0.2	Telephone call with CSL about the IJL class certification brief.	WSH	\$260	\$52
4/7/2008	0.1	Update excel spreadsheets for clients and employees.	MDZ	\$225	\$23
4/7/2008	0.3	Review fax from IJL employee; e-mail to MDZ and WSH re: follow up interview; speak to MDZ re: follow up interview.	JGB	\$620	\$186
4/7/2008	0.2	E-mails back and forth between JLN re: employee interview.	MDZ	\$225	\$45
4/7/2008	0.1	Call to J. Savannah to set-up interview time.	MDZ	\$225	\$23
4/7/2008	0.2	E-mails with JGB; spoke with WSH re: interviewing her.	MDZ	\$225	\$45
4/7/2008	1.3	Further draft class certification motion.	CSL	\$520	\$676
4/7/2008	0.2	Review the class certification motion.	WSH	\$260	\$52
4/7/2008	0.2	Talk with MZ about contacting the IJL client.	WSH	\$260	\$52
4/8/2008	0.6	Talk with franchisee, wrote memo.	MDZ	\$225	\$135
4/8/2008	0.1	Talk with JLN about the IJL phone call.	WSH	\$260	\$26
4/8/2008	0.2	Talk with CSL about the IJL phone call.	WSH	\$260	\$52
4/8/2008	1	Phone call with franchisee.	WSH	\$260	\$260
4/8/2008	3.4	Review and edit proposed class certification motion; review class certification decisions.	JGB	\$620	\$2,108
4/9/2008	0.1	Speak with CSL; scan in JGB's changes to class cert and e-mailed then to CSL.	MDZ	\$225	\$23

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/9/2008	1.3	Discussion of class cert and discovery issues with CSL and JLN; review of class cert brief.	JGB	\$620	\$806
4/9/2008	1.1	Discussions with JGB and review of documents in preparation for upcoming depositions, discussions planning depositions.	CSL	\$520	\$572
4/10/2008	0.4	Examine FRCP 23, etc.	SHJ	\$310	\$124
4/10/2008	1	Review relevant rules (CPLR & FRCP) and law (USC).	SHJ	\$310	\$310
4/10/2008	1	Examine substantive law (GBL) and case notes.	SHJ	\$310	\$310
4/11/2008	0.1	Send e-mail to set-up a time to interview potential class member.	MDZ	\$225	\$23
4/11/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
4/11/2008	0.2	Create engagement letter for David Tiberio; e-mail him with engagement letter and Complaint; follow-up e-mail to CSL and JGB.	MDZ	\$225	\$45
4/11/2008	0.4	Interview potential class member, David Tiberio.	MDZ	\$225	\$90
4/11/2008	0.2	E-mails with Ilya Soussa.	MDZ	\$225	\$45
4/11/2008	0.3	Navigate through GBL for clarification.	SHJ	\$310	\$93
4/14/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
4/14/2008	0.2	E-mails with Ilya Soussa, potential class member.	MDZ	\$225	\$45
4/14/2008	0.1	Reviewed Order Referring Case to Magistrate Judge	JLN	\$520	\$52
4/14/2008	0.1	Reviewed Order re: next conference & discovery deadline	JLN	\$520	\$52
4/15/2008	0.4	Interview Ilya Soussa.	MDZ	\$225	\$90

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/16/2008	0.2	Send follow-up e-mail to Ilya Soussa; create engagement letter; e-mail her complaint and engagement letter.	MDZ	\$225	\$45
4/16/2008	0.1	Reviewed Order Settlement Conference set for 6/2/2008	JLN	\$520	\$52
4/17/2008	0.3	Went through documents on Pacer and saved them to PA.	MDZ	\$225	\$68
4/18/2008	0.1	Filed	SHJ	\$310	\$31
4/18/2008	0.1	Review e-mail from Jonathan Wyatt; update excel spreadsheet.	MDZ	\$225	\$23
4/18/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
4/18/2008	0.1	Send e-mail to potential class member re: setting up interview.	MDZ	\$225	\$23
4/21/2008	4.3	Additional edits to class cert brief.	CSL	\$520	\$2,236
4/23/2008	0.3	Discussion with CSL and JN about the discovery and depositions.	WSH	\$260	\$78
4/23/2008	0.3	Discussion with CSL and JN about the IJL discovery.	WSH	\$260	\$78
4/24/2008	2.3	Discussions with JN regarding discovery and with review of documents produced by Defendant.	CSL	\$520	\$1,196
4/24/2008	0.3	Update excel spreadsheet; send follow-up e-mail to Dr. Wyatt; send engagement letter and copy of complaint.	MDZ	\$225	\$68
4/24/2008	0.1	Call Dr. Wyatt.	MDZ	\$225	\$23
4/24/2008	2.6	Researched defendants' failure to respond to interrogatories & potential remedies under caselaw	JLN	\$520	\$1,352
4/24/2008	0.5	Interview Dr. Wyatt.	MDZ	\$225	\$113
4/25/2008	0.1	Update Excel spreadsheet.	MDZ	\$225	\$23

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/25/2008	0.2	Update excel spreadsheet.	MDZ	\$225	\$45
4/25/2008	0.2	Review e-mail from potential class member; e-mail her to set up time to interview.	MDZ	\$225	\$45
4/25/2008	0.5	Interview with Julie Carr.	MDZ	\$225	\$113
4/25/2008	0.1	Write follow-up e-mail to Dr. Wyatt. Scan in engagement letter.	MDZ	\$225	\$23
4/25/2008	0.3	Write follow-up e-mail to Julie Carr; prepare engagement letter; send engagement letter and Complaint to her. Update excel.	MDZ	\$225	\$68
4/25/2008	2.4	Began to draft deficiency letter to defendants re: outstanding interrogatories	JLN	\$520	\$1,248
4/25/2008	0.5	Meet with JLN and discussions of next steps at case summary meeting.	CSL	\$520	\$260
4/26/2008	2.9	Continued working on deficiency letter re: interrogatories	JLN	\$520	\$1,508
4/27/2008	3.2	Researched case law re: requests for admissions and motions to compel re: same in SDNY.	JLN	\$520	\$1,664
4/28/2008	3.9	Continued drafting deficiency letter re: outstanding requests for admissions from defendants; requested response to same by May 1, 2008 or we will move to compel.	JLN	\$520	\$2,028
4/29/2008	0.3	Scan in initial disclosures.	MDZ	\$225	\$68
4/30/2008	0.1	Drafted Letter to BK re Depositions	JLN	\$520	\$52
4/30/2008	0.1	Reviewed IJL's Notice of Deposition for E. Packman	JLN	\$520	\$52
5/1/2008	2.8	Review and edit class certification motion.	JGB	\$620	\$1,736
5/2/2008	2.6	Meeting with JLN and CSL re: discovery and class cert issues; review class certification brief.	JGB	\$620	\$1,612

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/2/2008	0.3	Review news story about client arrest for IJL.	WSH	\$260	\$78
5/2/2008	3.2	Drafted motion to compel re: outstanding interrogatories	JLN	\$520	\$1,664
5/2/2008	0.2	E-mail with M. Hahn re: status of class action.	MDZ	\$225	\$45
5/4/2008	0.3	Case meeting with JGB, CSL, WSH, MWS.	MDZ	\$225	\$68
5/4/2008	0.3	General Case meeting.	CSL	\$520	\$156
5/5/2008	4.1	Research and final changes to Class Certification Motion.	CSL	\$520	\$2,132
5/5/2008	0.1	Save documents in database; followed-up with JGB.	MDZ	\$225	\$23
5/5/2008	0.1	Update IJL spreadsheet.	MDZ	\$225	\$23
5/5/2008	0.2	E-mail exchange w/def. counsel re: defendants failure to respond to plaintiffs' deficiency letter & avoidance of motion practice	JLN	\$520	\$104
5/5/2008	0.4	Communicate with JGB and CSL about the class certification brief.	WSH	\$260	\$104
5/7/2008	0.2	Printed out complaint and exhibits for CSL.	MDZ	\$225	\$45
5/7/2008	3.4	Review of documents and first draft of answers.	CSL	\$520	\$1,768
5/7/2008	0.2	Discuss IJL discovery requests with CSL.	WSH	\$260	\$52
5/8/2008	1.4	Meeting with JLN and CSL re: discovery issues; review class certification brief.	JGB	\$620	\$868
5/8/2008	1.9	Draft a letter to the other side and discussions with JGB and JN regarding the other side's request for an adjournment.	CSL	\$520	\$988
5/8/2008	0.1	Read letter to court from def. counsel re: extension of discovery deadline, objections to discovery requests	JLN	\$520	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/8/2008	0.1	Reviewed letter from BK re deposition of Packman	JLN	\$520	\$52
5/8/2008	0.2	Reviewed plaintiffs' response to defendants first request to produce	JLN	\$520	\$104
5/9/2008	1.8	Review discovery issues; e-mail to JLN and CSL.	JGB	\$620	\$1,116
5/9/2008	0.6	Edits to Response to Request for Admissions.	MWS	\$245	\$147
5/9/2008	1.1	Meeting with JN and JGB and discussion with JN afterwards.	CSL	\$520	\$572
5/9/2008	0.1	Letter from BK to Judge re Discovery extension	JLN	\$520	\$52
5/9/2008	0.2	Discuss IJL with CSL and JGB.	WSH	\$260	\$52
5/12/2008	1.4	Discussions with JLN and review of documents.	CSL	\$520	\$728
5/12/2008	0.3	Create engagement letter; mail letter out to S. Cassidy.	MDZ	\$225	\$68
5/12/2008	0.4	Interview Susan Calverley.	MDZ	\$225	\$90
5/12/2008	0.2	E-mails between. JGB and me re: new clients.	MDZ	\$225	\$45
5/12/2008	0.4	Interview Sandra Cassidy.	MDZ	\$225	\$90
5/12/2008	0.3	Create engagement letter; e-mail follow-up message and engagement letter to Susan Calverley.	MDZ	\$225	\$68
5/12/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
5/12/2008	0.1	Update IJL Class Members excel spreadsheet.	MDZ	\$225	\$23
5/12/2008	0.1	Pa-saved documents from JLN.	MDZ	\$225	\$23
5/13/2008	0.8	Discussions with Einat Packman and with JLN.	CSL	\$520	\$416
5/14/2008	1.2	Discussions with Bari Klein, call with the Court and draft of a letter to Judge Fox.	CSL	\$520	\$624

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/16/2008	0.2	Discuss with CSL scheduling and adversarial issues.	JGB	\$620	\$124
5/16/2008	0.5	Calls with Bari Klein.	CSL	\$520	\$260
5/16/2008	0.1	Print out and scan letter to B. Klein from CSL.	MDZ	\$225	\$23
5/16/2008	0.3	E-mail response to Lorraine re: time to interview; update excel spreadsheet.	MDZ	\$225	\$68
5/19/2008	0.7	Spoke to CSL: Initial Disclosures; work on interrogatories.	MDZ	\$225	\$158
5/19/2008	3.1	Prep for meeting with JLN; meeting with JLN; make changes to discovery responses and emails from B. Klein.	CSL	\$520	\$1,612
5/20/2008	1.6	Review and edit class certification brief; review class cert decisions.	JGB	\$620	\$992
5/20/2008	0.2	Speak to JGB re: Class and new class members.	MDZ	\$225	\$45
5/20/2008	0.2	Speak to CSL re: Interrogatories.	MDZ	\$225	\$45
5/20/2008	0.6	Work on Interrogatories	MDZ	\$225	\$135
5/20/2008	0.1	Update excel spreadsheet.	MDZ	\$225	\$23
5/20/2008	5.1	Draft responses to document demand; discussions with MDS and JLN and changes to the class cert brief.	CSL	\$520	\$2,652
5/21/2008	3.1	Calls with the other side; discussions with WSH and emails from E. Packman.	CSL	\$520	\$1,612
5/21/2008	0.2	PA save engagement letter and e-mails between Susan Calverley; update excel.	MDZ	\$225	\$45
5/21/2008	0.3	Speak with WSH and CSL; scan all Plaintiff's Response documents.	MDZ	\$225	\$68
5/21/2008	3.4	Drafted Motion to Compel re: IJL Admissions	JLN	\$520	\$1,768
5/21/2008	0.1	Discuss summer assignments.	WSH	\$260	\$26

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/21/2008	0.1	Discuss finding a new client for IJL.	WSH	\$260	\$26
5/21/2008	0.2	Discuss IJL issues with CSL.	WSH	\$260	\$52
5/21/2008	0.1	Discuss with CSL about working on IJL 30(b)(6) deposition.	WSH	\$260	\$26
5/21/2008	0.2	Spoke with CSL; arranged for car service for Einat Packman.	MDZ	\$225	\$45
5/21/2008	1.2	Work on 30(b)(6) deposition.	WSH	\$260	\$312
5/22/2008	0.2	Update excel spreadsheet.	MDZ	\$225	\$45
5/22/2008	0.3	Discuss IJL issues with CSL and MDZ.	WSH	\$260	\$78
5/22/2008	0.9	Mtg w/CSL re: E. Packman's decision to withdraw as lead plaintiff, his communication of same to defense counsel & court & next steps for moving forward	JLN	\$520	\$468
5/22/2008	6.3	Discussions with JLN, Bari Klein, JGB, outside 4 outside attorneys on Plaintiff replacement.	CSL	\$520	\$3,276
5/23/2008	4.1	Discussions with Bari Klein, JLN and with JGB.	CSL	\$520	\$2,132
5/23/2008	4.1	Email exchanges with Bari Klein, calls with JLN, meeting with JLN; discussions with JGB.	CSL	\$520	\$2,132
5/26/2008	1.4	Emails to JLN and to Christine Rodriguez.	CSL	\$520	\$728
5/27/2008	0.1	Update IJL spreadsheet.	MDZ	\$225	\$23
5/27/2008	0.1	E-mail potential class member back.	MDZ	\$225	\$23
5/27/2008	3.7	Discussions with JLN and Michelle Cox on motions this week; calls to potential clients.	CSL	\$520	\$1,924
5/27/2008	5.2	Discuss case with CSL; research cases for motion to substitute.	MNC	\$210	\$1,092

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/28/2008	0.5	Discuss discovery and motion to compel issues with CSL; e-mail CSL re: possible mooted of class rep issue; review e-mails.	JGB	\$620	\$310
5/28/2008	0.4	Review 8 responses from class members in e-mails; forward them to CSL.	MDZ	\$225	\$90
5/28/2008	0.1	Update excel.	MDZ	\$225	\$23
5/28/2008	0.3	Spoke with CSL; wrote e-mail to all class members re: seeing if anyone was interested in taking a more active role in case.	MDZ	\$225	\$68
5/28/2008	0.1	Wrote follow-up e-mail to CSL.	MDZ	\$225	\$23
5/28/2008	0.1	Call to Jamie Dandar.	MDZ	\$225	\$23
5/28/2008	0.1	Call to Linda - potential class member.	MDZ	\$225	\$23
5/28/2008	0.1	Call to Catherine Foulkes.	MDZ	\$225	\$23
5/28/2008	2.1	Emails and calls with the other side; letter to the court.	CSL	\$520	\$1,092
5/28/2008	3.3	Research for motion to substitute.	MNC	\$210	\$693
5/29/2008	0.2	Send follow-up e-mail to CSL re: named plaintiff.	MDZ	\$225	\$45
5/29/2008	0.4	Write e-mail to all class members who expressed interest in becoming more active.	MDZ	\$225	\$90
5/29/2008	0.4	Speak with CSL re: following-up with interested class members.	MDZ	\$225	\$90
5/29/2008	0.4	Review 12 additional e-mails from interested class members.	MDZ	\$225	\$90
5/29/2008	0.1	Reviewed Order settlement conference is canceled	JLN	\$520	\$52
5/29/2008	2.6	Case-law Research for FRCP 21.	MNC	\$210	\$546
5/29/2008	4.4	Calls with JLN and preparation for Court conference.	CSL	\$520	\$2,288

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/30/2008	2.1	Discussions with JLN and with MNC regarding the court appearance.	CSL	\$520	\$1,092
5/30/2008	0.3	Went through to see which potential named plaintiffs live in NYC; followed-up with CSL.	MDZ	\$225	\$68
5/30/2008	0.2	Discuss status with CSL.	WSH	\$260	\$52
5/30/2008	0.1	Reviewed Order re: motion dates	JLN	\$520	\$52
5/30/2008	0.3	Speak to CSL about scheduling potential named plaintiffs.	MDZ	\$225	\$68
5/30/2008	2	Attend status conference at SDNY with JLN.	MNC	\$210	\$420
5/30/2008	1.7	Read IJL complaint; discussed case with CSL.	MNC	\$210	\$357
6/2/2008	4.9	Motion to substitute.	MNC	\$210	\$1,029
6/2/2008	0.8	Discuss lead plaintiff situation with new lead plaintiff; discuss issues involved in class certification; discuss issues with CSL and MDZ.	JGB	\$620	\$496
6/2/2008	1.6	Organize files and scan documents.	CSL	\$520	\$832
6/2/2008	0.2	Review e-mail; try calling Jamie Dandar.	MDZ	\$225	\$45
6/2/2008	0.6	Scan documents.	MDZ	\$225	\$135
6/2/2008	0.2	Speak with CSL; print out memo; e-mail JLN copy of excel with class members.	MDZ	\$225	\$45
6/2/2008	3.1	Motion for Substitution.	CSL	\$520	\$1,612
6/3/2008	1.5	Amended complaint.	MNC	\$210	\$315
6/3/2008	0.3	Drafted Notice of Motion.	MNC	\$210	\$63
6/3/2008	0.4	Sent e-mail to Sandra Burga and Carrie Crockett and Andrew Woolf; spoke with CSL.	MDZ	\$225	\$90
6/3/2008	0.2	Work on preparing portion of IJL statement for CSL.	WSH	\$260	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/3/2008	0.3	Review new lead plaintiff e-mails; followed-up with CSL.	MDZ	\$225	\$68
6/3/2008	0.3	Speak with CSL; write e-mail to all interested named plaintiffs.	MDZ	\$225	\$68
6/3/2008	0.3	Speak with CSL; count amount of IJL contacts and people who have signed engagement letter; followed-up with CSL.	MDZ	\$225	\$68
6/3/2008	0.1	Update excel list IJL Class Members.	MDZ	\$225	\$23
6/3/2008	0.1	E-mail new potential class member.	MDZ	\$225	\$23
6/3/2008	0.1	Try calling Jamie Dandar again.	MDZ	\$225	\$23
6/3/2008	0.1	E-mail CSL re: named Plaintiffs.	MDZ	\$225	\$23
6/3/2008	0.3	Spoke with CSL re: information for motion re: C. Rodriguez.	MDZ	\$225	\$68
6/3/2008	5.1	Motion to substitute.	CSL	\$520	\$2,652
6/4/2008	1	Formatted IJL Substitution for Lead Plaintiff.	DPL	\$210	\$210
6/4/2008	0.2	E-mails between Lisa Bruno and me.	MDZ	\$225	\$45
6/4/2008	0.2	Printed out interview memos for CSL.	MDZ	\$225	\$45
6/4/2008	0.2	E-mail Janet; send her copy of filed complaint.	MDZ	\$225	\$45
6/4/2008	0.2	Made list of IJL potential lead plaintiffs and gave contact information to CSL.	MDZ	\$225	\$45
6/4/2008	4.6	Discussions with JLN and review of cases for motion for substitution.	CSL	\$520	\$2,392
6/5/2008	0.3	Drafted Declaration for Motion to substitute.	MNC	\$210	\$63
6/5/2008	2.3	Amended Complaint.	MNC	\$210	\$483

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/5/2008	5.5	Met with CLS and WSH; assigned to research, format and provide citations for Substitution of Lead Plaintiff for IJL; IJL [Motion to Substitute Lead Plaintiff].	DPL	\$210	\$1,155
6/5/2008	0.2	Spoke with WSH re: docs. for Michelle.	MDZ	\$225	\$45
6/5/2008	1.4	T/c w/Karen Malak (IJL client ? Chicago) re: IJL's deceptive sales tactics, lies during interviews, horrendous dating experiences, & desire to join class action to get refund	JLN	\$520	\$728
6/5/2008	0.3	Talk with CSL about status of motion papers.	WSH	\$260	\$78
6/5/2008	0.4	Discuss draft motion with David.	WSH	\$260	\$104
6/5/2008	0.5	Read through David's draft motion.	WSH	\$260	\$130
6/6/2008	2.8	Worked on revisions to Notice of Motion and Declaration.	MNC	\$210	\$588
6/6/2008	5	IJL [Motion to Substitute Lead Plaintiff].	DPL	\$210	\$1,050
6/6/2008	0.4	Spoke with CSL; worked on missing information for Motion to Substitute.	MDZ	\$225	\$90
6/6/2008	0.2	Phone call with Jamie Dandar.	MDZ	\$225	\$45
6/6/2008	0.1	Updated excel spreadsheet.	MDZ	\$225	\$23
6/6/2008	0.6	Reviewed Memorandum of Law in Support of motion to Substitute Party	JLN	\$520	\$312
6/6/2008	0.4	Reviewed Declaration with attachments of CL in Support Motion to Substitute Party	JLN	\$520	\$208
6/6/2008	0.1	Alert CSL about the news story sent by former employee.	WSH	\$260	\$26
6/6/2008	0.2	Go through file to make sure everything on PA is up to date.	WSH	\$260	\$52
6/6/2008	0.1	Update on status of case.	WSH	\$260	\$26

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/9/2008	0.2	E-mails between potential class member and meeting re: setting-up time for interview.	MDZ	\$225	\$45
6/9/2008	0.2	Prepared engagement letter; mailed Jamie Dandar letter.	MDZ	\$225	\$45
6/9/2008	0.1	Updated excel spreadsheet.	MDZ	\$225	\$23
6/9/2008	0.2	Sent follow-up e-mail to Jamie with complaint.	MDZ	\$225	\$45
6/9/2008	0.5	Phone interview with Jamie Dandar.	MDZ	\$225	\$113
6/9/2008	0.1	Updated excel spreadsheet.	MDZ	\$225	\$23
6/10/2008	0.1	Updated excel spreadsheet.	MDZ	\$225	\$23
6/10/2008	0.2	Followed-up re: D. Miller with CSL; e-mailed him her phone number.	MDZ	\$225	\$45
6/10/2008	0.5	Interview part 1 with Donna Miller.	MDZ	\$225	\$113
6/10/2008	0.4	Emails to JLN and discussions with JGB.	CSL	\$520	\$208
6/11/2008	0.1	Forwarded e-mail from class member to CSL.	MDZ	\$225	\$23
6/11/2008	0.9	Meeting with JLN regarding the memo of law filed on Friday and the upcoming settlement conference.	CSL	\$520	\$468
6/12/2008	0.8	Discuss settlement issues and settlement conference with CSL.	JGB	\$620	\$496
6/12/2008	0.3	E-mails with Carrie Crockett; spoke with JGB; forwarded e-mail to CSL and JGB.	MDZ	\$225	\$68
6/12/2008	0.5	Called Donna Miller twice; she called me twice; interview part 2; follow-up with JGB; spoke with KK; updated memo; updated excel.	MDZ	\$225	\$113
6/12/2008	0.2	E-mail Jamie Dandar.	MDZ	\$225	\$45
6/12/2008	0.2	Sent e-mail to update all class members.	MDZ	\$225	\$45
6/12/2008	0.3	E-mails between Dr. Jay and me.	MDZ	\$225	\$68

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/12/2008	0.1	Phone call to D. Miller.	MDZ	\$225	\$23
6/12/2008	0.2	E-mails from A. Woolf; forwarded to CSL.	MDZ	\$225	\$45
6/13/2008	0.4	Reviewed Affirmation of Bari Klein in Opposition of Motion to Substitute Party	JLN	\$520	\$208
6/16/2008	3.4	Reviewed Opposing counsels Opposition to Motion to Sub/Case-law research/Case briefs for CSL.	MNC	\$210	\$714
6/16/2008	0.2	E-mails with M. Cox re: IJL Plaintiff Jim Tortura.	MDZ	\$225	\$45
6/16/2008	3.1	Finishing Reply brief.	CSL	\$520	\$1,612
6/17/2008	2.4	Drafted 3rd prong of reply to opposition to Motion to Sub.	MNC	\$210	\$504
6/17/2008	3.2	Reviewed Opposing counsels Opposition to Motion to Sub/Case-law research/Case briefs for CSL.	MNC	\$210	\$672
6/17/2008	0.2	E-mails between. M. Cox; sent two documents to CSL and M. Cox.	MDZ	\$225	\$45
6/17/2008	3.4	Discussions with other attorneys and review of reply brief information.	CSL	\$520	\$1,768
6/18/2008	3	Reply to Motion to Substitute Lead Plaintiff.	DPL	\$210	\$630
6/18/2008	0.8	Work on the IJL motion.	WSH	\$260	\$208
6/18/2008	2.1	Finishing reply and filing.	CSL	\$520	\$1,092
6/18/2008	0.6	Reviewed Reply Memorandum of Law in Support of Motion to Substitute Party	JLN	\$520	\$312
6/18/2008	0.1	Discuss filing IJL with CSL.	WSH	\$260	\$26
6/18/2008	1.2	Work on IJL motion with David.	WSH	\$260	\$312
6/18/2008	0.3	Proof and upload the IJL motion.	WSH	\$260	\$78

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/19/2008	1.1	Printed out all documents on pacer and all correspondence documents.	MDZ	\$225	\$248
6/20/2008	0.6	Printed out rest of documents on pacer.	MDZ	\$225	\$135
6/20/2008	0.8	Settlement conference letter.	CSL	\$520	\$416
6/20/2008	0.3	E-mails between C. Griffen and me; followed-up with CSL.	MDZ	\$225	\$68
6/23/2008	0.1	Discussion about letter to the court.	WSH	\$260	\$26
6/23/2008	0.1	Correspond with CSL and JGB about signing the letter.	WSH	\$260	\$26
6/23/2008	0.2	Review and make changes to letter to Judge Fox.	WSH	\$260	\$52
6/23/2008	0.1	Send email to JGB for input on letter.	WSH	\$260	\$26
6/23/2008	0.4	Work on IJL letter to be sent out.	WSH	\$260	\$104
6/23/2008	0.2	Scan and email out to the court the letter.	WSH	\$260	\$52
6/23/2008	0.7	Meeting with JGB on settlement conference.	CSL	\$520	\$364
6/24/2008	0.1	Reviewed Order re: settlement conference schedule is adjourned	JLN	\$520	\$52
6/24/2008	0.5	Correspond with MJN about faxing out documents, and scan and email documents to the other parties.	WSH	\$260	\$130
6/24/2008	0.1	Give CSL an update on IJL.	WSH	\$260	\$26
6/24/2008	0.1	Give JGB an update on IJL.	WSH	\$260	\$26
6/24/2008	0.2	Fill out form to be submitted to the judge.	WSH	\$260	\$52
6/24/2008	0.2	Discuss with CSL the IJL letter.	WSH	\$260	\$52
6/24/2008	0.4	Draft IJL letter to the court.	WSH	\$260	\$104
6/24/2008	0.8	Case meeting and emails back and forth from JLN and JGB, as well as letter to the Court.	CSL	\$520	\$416

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/30/2008	0.2	Updated excel spreadsheet; pa saved document re: settlement; created template.	MDZ	\$225	\$45
7/2/2008	0.2	E-mails with CSL; updated excel spreadsheet.	MDZ	\$225	\$45
7/10/2008	0.1	E-mail from CSL; updated excel list of IJL Class Members	MDZ	\$225	\$23
7/17/2008	0.8	Spoke with CSL; downloaded case file.	MDZ	\$225	\$180
7/17/2008	1.4	Summary doc and exchanges with JLN.	CSL	\$520	\$728
7/19/2008	0.1	Reviewed e-mail from potential IJL client; e-mailed JGB.	MDZ	\$225	\$23
7/21/2008	1.7	Meeting with JLN on what steps to take immediately after decision on motion to substitute and discussions with JGB.	CSL	\$520	\$884
7/28/2008	0.3	Discussions with analysts.	CSL	\$520	\$156
7/30/2008	0.1	Reviewed Order: Plaintiff's motion to amend the complaint is granted	JLN	\$520	\$52
8/2/2008	1.9	Review and make edits to proposed amended complaint; e-mail JWD, CSL re: filing and editing issues.	JGB	\$690	\$1,311
8/4/2008	0.7	Speak to WSH and e-mail JWD and MJN re: filing and service of amended complaint issues.	JGB	\$690	\$483
8/4/2008	2.5	Proofread/edit amended IJL complaint.	JWD	\$210	\$525
8/5/2008	0.6	Discussion with JWD and review of documents related to filing amended complaint.	JGB	\$690	\$414
8/5/2008	1.25	Delivering/filing amended complaint at SDNY.	JWD	\$210	\$263
8/5/2008	0.7	Preparing and printing complaints to be filed.	JWD	\$210	\$147
8/5/2008	0.2	Reviewed Amended Complaint with additional documents attached	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/6/2008	0.4	Discussion with JWD of filing coordination issues.	JGB	\$690	\$276
8/11/2008	0.9	Discuss IJL complaint filing issues with CSL and JWD.	JGB	\$690	\$621
8/11/2008	1.4	Exchanges with Bari Klein and discussion with analyst on the issue of filing the amended.	CSL	\$520	\$728
8/12/2008	1.1	Call with court and discussion with B. Klein.	CSL	\$520	\$572
8/12/2008	0.8	Discuss with JLN host of issues involved in class cert motion, new pleadings, and discovery; e-mail KK and CSL re: legal issues involved in class cert and new potential filing.	JGB	\$690	\$552
8/12/2008	0.3	Conversation with CSL and WSH about answering issues.	JGB	\$690	\$207
8/13/2008	0.8	Conversation with counsel re: class certification.	JGB	\$690	\$552
8/14/2008	0.6	Write/fax letter to Judge Fox re: settlement conference date.	JWD	\$210	\$126
8/14/2008	0.1	Reviewed letter from John Doody dated 8/13/08 re:enlarge time to answer or otherwise move August 29, 2008.	JLN	\$520	\$52
8/19/2008	0.4	Discuss IJL filing strategy with JGB.	WSH	\$290	\$116
8/19/2008	2.1	Editing Mallen IJL complaint.	JWD	\$210	\$441
8/25/2008	1.1	Edits to class cert brief.	JGB	\$690	\$759
8/25/2008	0.2	Receipt and scanning of IJL Affidavits of Service.	JWD	\$210	\$42
8/28/2008	0.3	PA save wooded rapist articles for IJL.	JWD	\$210	\$63
9/2/2008	1.4	Discussions regarding the merits of the motion to dismiss and next steps with JN and WSH and review of motion to dismiss.	CSL	\$570	\$798
9/3/2008	1.2	Discussion with CSL and WSH re: response to motion to dismiss; review rules; read decision.	JGB	\$690	\$828

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/3/2008	6.3	Incorporated previous suggested changes and edits directly into certification brief; made several additional changes and edits to brief.	NRB	\$225	\$1,418
9/3/2008	0.4	Discussion about IJL motion to dismiss.	WSH	\$290	\$116
9/3/2008	3.4	Begin drafting letter to Court on the other sides lack of a motion, discussion with JGB and JLN, email to Bari Klein and discussion with WSH on lack of motion; research on difference between 12(b)(6) and 12(c).	CSL	\$570	\$1,938
9/4/2008	0.2	Meeting with JLN.	JWD	\$210	\$42
9/4/2008	0.2	Printing out documents for IJL meeting with Norinsberg.	JWD	\$210	\$42
9/4/2008	0.4	Discussions with CSL re: scheduling for motion to dismiss and other motion to dismiss issues.	JGB	\$690	\$276
9/4/2008	0.4	Emailing potential IJL Class members.	JWD	\$210	\$84
9/4/2008	0.1	Scan/PA save affidavit of service.	JWD	\$210	\$21
9/4/2008	2.4	Meeting with JLN regarding motion to dismiss and discussions with JWD regarding new clients and emails to Bari Klein.	CSL	\$570	\$1,368
9/4/2008	0.1	Reviewed defendant's Motion to Dismiss	JLN	\$520	\$52
9/4/2008	1.8	Reviewed Memorandum of Law in Support Motion to Dismiss with attachments; took notes re: same	JLN	\$520	\$936
9/8/2008	0.2	Email to Bari Klein re: stipulation.	JWD	\$210	\$42
9/8/2008	0.4	Editing and printing stipulation.	JWD	\$210	\$84
9/8/2008	0.8	Drafting stipulation.	JWD	\$210	\$168
9/9/2008	2.9	Researched case law cited by defendants in their Motion to Dismiss re: GBL 349 and 350-a	JLN	\$520	\$1,508

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/10/2008	2.4	Researched case law cited by defendants in their MTD re: negligent misrep. & unjust enrichment	JLN	\$520	\$1,248
9/11/2008	4.9	Researched case law re: fraudulent inducement v. breach of K, unjust enrichment, NY GBL 349	JLN	\$520	\$2,548
9/12/2008	4.25	Researched case law re: fed v. state stds on fraud, re: GBL 350, GBL 394-c & negligent misrep.	JLN	\$520	\$2,210
9/12/2008	2.6	Conducted research into class actions under NY law based on 349	JLN	\$520	\$1,352
9/12/2008	3.4	Researched issue of different standards of review for re: 12(b)(6) motion v. 12(c) (answer filed) & possible consequences based on defendants' misfiling as 12(b)(6)	JLN	\$520	\$1,768
9/13/2008	2.1	Started drafting detailed outline for response to defendants' MTD	JLN	\$520	\$1,092
9/13/2008	3.3	Additional research re: fraudulent inducement in other circuits	JLN	\$520	\$1,716
9/13/2008	2.9	Research into GBL 394	JLN	\$520	\$1,508
9/14/2008	3.6	Conducted research into fraud class actions under NY law based on common law fraud	JLN	\$520	\$1,872
9/14/2008	4.3	Complied bound volume of all legal research found to date to be used in response to defendants' MTD; began to highlight significant quotes from each case for use in motion	JLN	\$520	\$2,236
9/15/2008	2.75	Continued working on section in opp brief re: NY GBL 349	JLN	\$520	\$1,430
9/16/2008	0.4	Emailing IJL potential clients and lead plaintiff.	JWD	\$210	\$84
9/16/2008	4.6	Continued process of extracting quotes from all cases & importing into draft opp. outline	JLN	\$520	\$2,392
9/16/2008	1.2	T/c w/Dolph Michael (IJL client in LA) re: deceptive & fraudulent sales tactics used by IJL and his overall experiences w/IJL	JLN	\$520	\$624

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/16/2008	0.1	Reviewed Stipulation setting briefing schedule	JLN	\$520	\$52
9/16/2008	5.2	Began to extract all quotes from case law, importing into draft opp. outline separately for each claim	JLN	\$520	\$2,704
9/17/2008	4.4	Finished section in brief re: GBL 349; started on section re: fraud distinguishable from K claim	JLN	\$520	\$2,288
9/18/2008	7.9	Continued drafting sections in brief re: fraudulent inducement v. breach of contract; present promise v. future performance; promises collateral to k v. performance expected under K; & facts in complaint to support distinction	JLN	\$520	\$4,108
9/19/2008	0.1	Email to Jeri Kaplan about engagement letter.	JWD	\$210	\$21
9/19/2008	0.3	Phone call with Jeri Kaplan about IJL class action.	JWD	\$210	\$63
9/20/2008	1.25	Finished unjust enrichment section	JLN	\$520	\$650
9/22/2008	0.1	Email engagement letter to Jeri Kaplan.	JWD	\$210	\$21
9/24/2008	0.2	Review motion to dismiss; e-mail to CSL and JLN re: MTD issues.	JGB	\$690	\$138
9/24/2008	2.9	Researched 9(b) fraud particularity stds;	JLN	\$520	\$1,508
9/24/2008	6.2	Finished drafting facts section,& prel. statement	JLN	\$520	\$3,224
9/25/2008	2.6	Summary document.	CSL	\$570	\$1,482
9/25/2008	4.6	Drafted section re: 9(b) fraud particularity stds integrating specific factual allegations of complaint into section.	JLN	\$520	\$2,392
9/26/2008	6.6	Revised, edited and added sections to pl. opp. to def. MTD.	JLN	\$520	\$3,432
9/27/2008	3.9	Further edits, revisions & changes to P. opp. Brief.	JLN	\$520	\$2,028
9/28/2008	7.1	Continued w/ revisions & edits to brief	JLN	\$520	\$3,692

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/29/2008	4.4	Made additional changes, revisions & edits to opp. brief.	JLN	\$520	\$2,288
9/30/2008	2.7	Review and edit of class cert brief;e-mail to and phone conversation with CSL on case.	JGB	\$690	\$1,863
9/30/2008	2.6	Researched cases decided by Judge Stein on fraud, fraudulent inducement, & NY claims alleged in complaint	JLN	\$520	\$1,352
9/30/2008	8.1	Continued making changes, edits revisions to draft opp	JLN	\$520	\$4,212
10/1/2008	1.2	Work on IJL brief for motion to dismiss.	WSH	\$290	\$348
10/1/2008	0.3	Correspond with CSL concerning motion to dismiss.	WSH	\$290	\$87
10/1/2008	0.4	IJL Class Members research.	JWD	\$210	\$84
10/1/2008	5.3	Edited the draft of the opposition to motion to dismiss.	CSL	\$570	\$3,021
10/2/2008	0.5	Email update to Class Members.	JWD	\$210	\$105
10/2/2008	0.6	Research into FRCP 12(c) and 12(h).	WSH	\$290	\$174
10/2/2008	1.7	Work on IJL opposition to motion to dismiss.	WSH	\$290	\$493
10/3/2008	1.2	Draft of Document Demands.	JWD	\$210	\$252
10/3/2008	1.4	Editing Opposition to Motion to Dismiss.	JWD	\$210	\$294
10/3/2008	0.7	Putting together and ECFing opposition to MTD.	JWD	\$210	\$147
10/3/2008	0.9	Review opposition to motion to dismiss; make changes and have JWD ECF the document.	WSH	\$290	\$261
10/4/2008	0.3	Work on summary document.	JWD	\$210	\$63
10/6/2008	0.2	Email to Andy Wolf re: becoming a Class Member.	JWD	\$210	\$42
10/7/2008	1.7	Organizing documents in PA and Z drive.	JWD	\$210	\$357

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/7/2008	0.2	Email to Susan Smith about becoming a class member.	JWD	\$210	\$42
10/16/2008	0.1	Sorting emails.	JWD	\$210	\$21
10/17/2008	0.8	Updating contacts in PA.	JWD	\$210	\$168
10/17/2008	0.9	Reviewed Reply brief in Opposition to Motion to Dismiss; took notes re: same	JLN	\$520	\$468
10/20/2008	0.2	E-mails to and from JLN and CSL re: next steps in motion to dismiss, including hearing and argument issues.	JGB	\$690	\$138
10/21/2008	0.3	Email and putting together engagement letter for Andrew Woolf.	JWD	\$210	\$63
10/21/2008	2.6	Researched case law cited by defendants in their Reply Brief	JLN	\$520	\$1,352
10/21/2008	0.1	Reviewed Order that case be referred to Magistrate Judge for Dispositive Motion	JLN	\$520	\$52
10/22/2008	0.3	Changes to summary doc.	CSL	\$570	\$171
10/22/2008	0.2	Discuss next steps given case referral with CSL.	JGB	\$690	\$138
10/24/2008	0.3	Case meeting.	CSL	\$570	\$171
10/25/2008	0.4	Discuss class cert issues with outside counsel.	JGB	\$690	\$276
10/28/2008	0.2	Discuss with CSL eventual filing of complaint and work with JLN.	JGB	\$690	\$138
10/28/2008	0.2	Discuss case with CSL including next steps and staffing to case.	JGB	\$690	\$138
10/28/2008	0.4	Class cert discussions with YAA and general sum docs meeting with JGB.	CSL	\$570	\$228
10/30/2008	1.1	Summary document.	JWD	\$210	\$231
11/1/2008	0.1	Review class cert procedure.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/2/2008	0.1	Review class cert and discovery demands with CSL.	JGB	\$690	\$69
11/4/2008	0.4	Emails with Andrew Woolf and sending him an engagement letter.	JWD	\$210	\$84
11/4/2008	0.4	Review class certification issues; discuss with counsel; review class certification motion.	JGB	\$690	\$276
11/7/2008	0.2	Discuss next steps in case and staffing issues with CSL and MJN.	JGB	\$690	\$138
11/10/2008	0.2	Research and discussion with CSL about next step in the case.	JWD	\$210	\$42
11/13/2008	0.8	Changes to Class Cert motion.	CSL	\$570	\$456
11/14/2008	0.2	Discuss filing of complaint with JGB and JLN.	CSL	\$570	\$114
11/16/2008	0.4	Review next steps needed, including class cert and discovery.	JGB	\$690	\$276
11/17/2008	0.2	Discuss motion to dismiss issues with JGB.	CSL	\$570	\$114
11/17/2008	0.1	Discuss filing of complaint with CSL.	JGB	\$690	\$69
11/17/2008	0.2	Discuss motion to dismiss and other case pushing issues with CSL.	JGB	\$690	\$138
11/18/2008	0.4	Discuss potential trial issues in matter with outside counsel.	JGB	\$690	\$276
11/20/2008	0.2	Discuss case time table with JGB and MJN.	CSL	\$570	\$114
11/20/2008	0.2	Discuss case timetable with CSL and MJN.	JGB	\$690	\$138
11/21/2008	0.6	Review motion to dismiss and case status issues; discuss with CSL.	JGB	\$690	\$414
11/23/2008	0.5	Review class certification memo and issues; review exhibit for class cert memo; follow up on plaintiff issues.	JGB	\$690	\$345

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/23/2008	0.1	Discuss with CSL about looking into the IJL conflicts issues.	WSH	\$290	\$29
11/24/2008	1.4	Discussions with JLN and with JGB, getting letter sent to the Court.	CSL	\$570	\$798
11/24/2008	0.2	Formatting letter to be sent to Judge Fox about lifting the discovery stay and scheduling a court conference.	JWD	\$210	\$42
11/24/2008	0.4	Meeting with JGB and CSL about moving forward on the case.	JWD	\$210	\$84
11/24/2008	0.1	Speak with CSL about IJL conflicts issues.	WSH	\$290	\$29
11/24/2008	0.3	Compose email to CSL about conflicts issues.	WSH	\$290	\$87
11/25/2008	1.7	Worked on class cert brief.	YAA	\$290	\$493
11/26/2008	0.2	Emailed JGB about deadline for class cert for case.	YAA	\$290	\$58
11/26/2008	0.4	Worked on class cert - updating brief.	YAA	\$290	\$116
11/26/2008	0.1	Spoke with CSL re: my progress with the class cert.	YAA	\$290	\$29
11/26/2008	0.3	Spoke with DWW about tables of contents and authorities for class cert brief, fixed formatting and reviewed details with him.	YAA	\$290	\$87
11/30/2008	0.4	Discuss class cert issues with outside counsel.	JGB	\$690	\$276
12/1/2008	2.1	Discuss motion to dismiss, class certification, and discovery issues with JLN during lunch meeting; discuss all issues with CSL.	JGB	\$690	\$1,449
12/2/2008	1.1	Create Thunderbird email group for class members and sending out an email to update class members on case development; send email to Andy Wolf about fees associated with the case. Email to Plaintiff Christine Rodriguez about the motion to dismiss.	JWD	\$210	\$231

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/2/2008	0.1	Reviewed Endorse Letter addressed to Magistrate Judge Fox from CL requesting a conference to address several outstanding discovery issues.	JLN	\$520	\$52
12/3/2008	0.2	Met with CSL about research for IJL.	KFC	\$290	\$58
12/3/2008	1.1	Reading through IJL file to prepare for research.	KFC	\$290	\$319
12/3/2008	0.3	Finding, saving, and printing case law for JGB and CSL.	JGB	\$690	\$207
12/4/2008	1.8	Review possible next steps with outside counsel.	JGB	\$690	\$1,242
12/4/2008	1.7	Changes to class certification motion, reviewed the motion consistent with JGB's email.	CSL	\$570	\$969
12/4/2008	3.3	Researched choice of law issues for IJL.	KFC	\$290	\$957
12/4/2008	1.9	Performed research at NYCLA re: choice of law issues.	KFC	\$290	\$551
12/4/2008	0.6	Read through more IJL documents to get familiarized; began research on choice of law issues.	KFC	\$290	\$174
12/4/2008	1	Went to NYCLA to read treatise on applicable class cert law.	YAA	\$290	\$290
12/4/2008	0.6	Read through IJL complaint and class certification.	KFC	\$290	\$174
12/5/2008	0.2	Spoke to WSH about choice of law issues.	KFC	\$290	\$58
12/5/2008	1.9	Started memo on choice of law issues.	KFC	\$290	\$551
12/5/2008	2.4	Conducted research on choice of law issues.	KFC	\$290	\$696
12/5/2008	1	NYCLA library to find law for class cert brief.	YAA	\$290	\$290
12/5/2008	0.1	Spoke with JGB about deadline.	YAA	\$290	\$29
12/5/2008	0.7	Class Cert corrections.	YAA	\$290	\$203
12/6/2008	1.4	Discuss class certification and discovery issues with CSL; review GBL 349 case.	JGB	\$690	\$966

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/7/2008	2.1	Discussions with attorneys on whether to bring a California action, review of choice of law research and emails to JGB.	CSL	\$570	\$1,197
12/7/2008	2.4	Review class certification and discovery issues; discuss with CSL; review class cert cases.	JGB	\$690	\$1,656
12/7/2008	1.9	Work on class cert corrections, case law, etc.	YAA	\$290	\$551
12/8/2008	0.4	Organizing cases and notes for the IJL research.	KFC	\$290	\$116
12/8/2008	2.7	Researched issues re: IJL for CSL.	KFC	\$290	\$783
12/8/2008	0.2	Discussed IJL issues and strategy with CSL.	KFC	\$290	\$58
12/8/2008	3.1	Researched Rule 41 issues for IJL.	KFC	\$290	\$899
12/8/2008	4.1	Call with JGB and JLN, review of other side's letter, court's local rules, and previous motions filed in preparation for call with Court tomorrow.	CSL	\$570	\$2,337
12/8/2008	2.4	Finished class certification corrections, added new case law, etc.	YAA	\$290	\$696
12/8/2008	0.1	Conversation with JWD about applicable case law.	YAA	\$290	\$29
12/8/2008	0.1	Conversation with YAA about applicable case law.	JWD	\$210	\$21
12/8/2008	2.9	Review and discuss tactical, class cert, and discovery issues with CSL and JLN in phone calls and e-mails.	JGB	\$690	\$2,001
12/9/2008	2.1	Review and edit class certification brief; discuss matter with outside counsel.	JGB	\$690	\$1,449
12/9/2008	2.1	Review and discuss tactical, class cert, and discovery issues with CSL in phone calls and e-mails; review proposed letter and e-mails; discuss matter with individual re: jury appeal and tactical considerations.	JGB	\$690	\$1,449

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/9/2008	0.8	Formatting class certification brief and printing off copy for CSL. Printing off copy of judge's order for CSL.	JWD	\$210	\$168
12/9/2008	0.5	Telecon w/ MJ Fox re: outstanding discovery	JLN	\$520	\$260
12/9/2008	4.1	Preparation for call with the Court, discussions with JLN on preparation for the call, call with the Court and discussions with JGB regarding next steps after the call.	CSL	\$570	\$2,337
12/9/2008	0.2	Spoke to CSL about IJL issues and upcoming call.	KFC	\$290	\$58
12/9/2008	0.7	Outlining research issues for IJL.	KFC	\$290	\$203
12/9/2008	0.1	Spoke with JWD about tables of contents and authorities for class cert.	YAA	\$290	\$29
12/10/2008	0.4	Making sure PA version of amended complaint is the same as the one that was filed with the Court. Saving court document re: Discovery hearing.	JWD	\$210	\$84
12/10/2008	0.4	Editing and printing out letter to the judge re: discovery.	JWD	\$210	\$84
12/10/2008	1.2	Review new complaint issues; review consolidated amended complaint issues; discuss with outside counsel.	JGB	\$690	\$828
12/10/2008	0.1	Discussion with CSL and YAA about client meeting.	JWD	\$210	\$21
12/10/2008	1.1	Drafting a letter to send to Court requesting discovery stay be lifted, discussion with JGB and emails and calls to JLN.	CSL	\$570	\$627
12/11/2008	2.1	Review new complaint issues; read proposed letter; research discovery dispute issue; discuss all issues with CSL; review consolidated amended complaint issues; discuss with outside counsel.	JGB	\$690	\$1,449
12/11/2008	1.4	Making sure all court files are saved in the matter folder.	JWD	\$210	\$294

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/11/2008	0.2	Speak with JWD about file organization.	WSH	\$290	\$58
12/12/2008	0.4	Met with CSL and JWD about how to proceed re: motion to dismiss.	KFC	\$290	\$116
12/12/2008	0.1	Discuss case status with CSL.	JGB	\$690	\$69
12/12/2008	0.2	Discussing case at weekly case meeting.	JWD	\$210	\$42
12/12/2008	0.4	Meeting with KFC, CSL, and JLN about moving forward with the case.	JWD	\$210	\$84
12/12/2008	0.3	Case meeting with staff and meeting with JGB on cases status.	CSL	\$570	\$171
12/15/2008	0.3	Scanning and faxing a letter to Judge Stein, Judge Fox, opposing counsel, and JLN.	JWD	\$210	\$63
12/16/2008	0.6	Discuss tactical and possible settlement issues with outside counsel.	JGB	\$690	\$414
12/18/2008	2.4	Phone call with JLN and CSL re: next steps, discovery, discovery letter, complaint, and complaint consolidation; review consolidation standards; review consolidation letters.	JGB	\$690	\$1,656
12/18/2008	0.6	Editing and printing letter to court for CSL to sign. Sending letter to court and opposing counsel via facsimile.	JWD	\$210	\$126
12/18/2008	0.1	Letter to Judge lifting stay reply	JLN	\$520	\$52
12/18/2008	0.1	Scanning and saving engagement letter from Andrew Wolf.	JWD	\$210	\$21
12/19/2008	0.1	Discussing case at case meeting.	JWD	\$210	\$21
12/20/2008	0.2	Discuss tactical and possible settlement issues with outside counsel.	JGB	\$690	\$138
12/21/2008	1.8	Drafted Motion to Consolidate, Notice of Motion to Consolidate, and Memorandum in support of Motion to Consolidate.	KFC	\$290	\$522

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/21/2008	0.4	Looked over documents needed for Motion to Consolidate.	KFC	\$290	\$116
12/21/2008	0.7	Discuss settlement issues with CSL; discuss complaint and consolidation issues with KFC; review consolidation standards.	JGB	\$690	\$483
12/21/2008	0.3	Discuss settlement issues with JGB.	CSL	\$570	\$171
12/22/2008	6.7	Researched CA claims for new IJL complaint; Drafted new complaint for IJL; Spoke on the phone with CSL about the content of the complaint.	KFC	\$290	\$1,943
12/22/2008	0.3	Converting documents PDF and saving final copies to PA.	KFC	\$290	\$87
12/22/2008	0.1	Spoke to Ronen Sarraf on phone re: later-filed action issues in Motion to Consolidate.	KFC	\$290	\$29
12/22/2008	3.1	Finished drafting Motion to Consolidate; Notice of Motion to Consolidate; and Memorandum in Support of Motion to Consolidate.	KFC	\$290	\$899
12/22/2008	0.2	Proofread complaint.	KFC	\$290	\$58
12/22/2008	2.1	Review and edit consolidation documents; review consolidation standards.	JGB	\$690	\$1,449
12/23/2008	0.9	Review consolidation order and motion; review proposed motion; discuss with KFC and CSL.	JGB	\$690	\$621
12/23/2008	0.4	Drafted letter to court re: new related action with Plaintiff Andrew Woolf.	KFC	\$290	\$116
12/23/2008	1.4	Finished proofreading new complaint; Printed copies for review.	KFC	\$290	\$406
12/28/2008	3.1	Researched piercing the corporate veil theory for new complaint.	KFC	\$290	\$899
12/29/2008	1.3	Review of KFC's draft of the new Andrew Woolf Complaint.	CSL	\$570	\$741

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/29/2008	1.4	Call with KFC, call with JGB and exchanges with JWD on Andy Woolf.	CSL	\$570	\$798
12/29/2008	3.7	Researched and read cases for Memorandum; Drafted and edited Memorandum in Support of Motion to Consolidate.	KFC	\$290	\$1,073
12/29/2008	1.3	Edited drafts of Notice of Motion and Proposed Order.	KFC	\$290	\$377
12/29/2008	0.1	Discussion with JWD about new complaint.	KFC	\$290	\$29
12/29/2008	3.7	Discussion with KFC about new complaint. Editing memorandum of law in support of motion to consolidate. Doing research on Riverside Microcap Fund. Doing research on the development of IJL's website. Updating summary document. Editing new complaint to be filed in California.	JWD	\$210	\$777
12/29/2008	0.2	Spoke to CSL on phone about IJL motion and complaint.	KFC	\$290	\$58
12/29/2008	0.3	Reviewed draft of complaint for clerical errors.	KFC	\$290	\$87
12/29/2008	4.7	Researched Riverside Company; Researched piercing the corporate veil theory; Drafted new complaint with new defendant.	KFC	\$290	\$1,363
12/30/2008	0.8	Editing and reviewing summary document. Creating dossiers for the case.	JWD	\$210	\$168
12/30/2008	2.7	Completed summary document for IJL.	KFC	\$290	\$783
1/2/2009	0.2	Proofread and printed summary document.	KFC	\$290	\$58
1/5/2009	0.2	Saving a PDF copy of Riverside Company's website regarding microcap fund.	JWD	\$210	\$42
1/5/2009	2.2	Review and edit complaint and related documents; discuss with KFC and CSL	JGB	\$690	\$1,518
1/5/2009	1.4	Researched more case law re: piercing of the corporate veil and the pleading requirements.	KFC	\$290	\$406

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/5/2009	0.1	Spoke to JGB about Woolf complaint and the piercing of the veil claim.	KFC	\$290	\$29
1/5/2009	2.1	T/c w/Michelle LePage (former IJL employee ? Hallandale) re: IJL's fraudulent & deceptive sales practices, Florida Call Center, potential witnesses, etc	JLN	\$520	\$1,092
1/5/2009	0.8	Reviewed JGB's IJL email re: tasks for tomorrow; Organized tasks for tomorrow and emailed JWD; Reviewed complaint and motion for editing.	KFC	\$290	\$232
1/6/2009	3.1	Review of Court's decision, discussions with KFC and JGB on next steps, discussions with JLN.	CSL	\$570	\$1,767
1/6/2009	0.2	Emailing draft of complaint to client.	JWD	\$210	\$42
1/6/2009	1.5	Added 12(g) section into motion for consolidation; Researched practices in manual for complex litigation.	KFC	\$290	\$435
1/6/2009	1.1	Further edits on motion for consolidation documents.	KFC	\$290	\$319
1/6/2009	2.2	Drafted letter to Judge Stein re: related Woolf case; Edited motion for consolidation; Researched current cases to use for motion for consolidation; Spoke to JWD about the edits for Woolf complaint and motion for consolidation.	KFC	\$290	\$638
1/6/2009	0.1	Spoke to JGB re motion for consolidation strategy and letter to the court.	KFC	\$290	\$29
1/6/2009	0.2	Spoke to Ronen Gentile on the phone re: motion for consolidation questions.	KFC	\$290	\$58
1/6/2009	2.2	Review and edit complaint, motion, letter, and proposed order; phone call with CSL.	JGB	\$690	\$1,518
1/6/2009	0.6	Telephone conversation with Andrew Woolf. Discussing complaint with JWD.	KFC	\$290	\$174

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/6/2009	1.6	Telephone conversation with Andrew Woolf. Discussing complaint with KFC. Editing and adding to the complaint.	JWD	\$210	\$336
1/6/2009	0.2	Discussing case at case meeting.	JWD	\$210	\$42
1/6/2009	2.4	Email to KFC about plaintiff in new action. Editing new SDNY complaint. Editing and reformatting notice of motion to consolidate and memorandum of law in support of motion to consolidate.	JWD	\$210	\$504
1/6/2009	2.1	Discuss new complaint, motion, and consolidation issues with CSL and KFC; review letter and motion.	JGB	\$690	\$1,449
1/6/2009	1.8	F/u t/c w/Michelle LePage re: deceptive sales practices & techniques & IJL's training re: same, & contact info for Angel Velesquez (Head of national sales)	JLN	\$520	\$936
1/6/2009	1.1	Line edited IJL motion and complaint drafts.	KFC	\$290	\$319
1/7/2009	3.9	Editing, formatting, and doing research for Andrew Woolf complaint.	JWD	\$210	\$819
1/7/2009	0.1	Read Judge Stein's Order clarifying that discovery should proceed forward and that there is no stay in effect right now.	JLN	\$520	\$52
1/7/2009	0.1	E-mail from M. Le Page re: Alexander Torrance & another potential witness	JLN	\$520	\$52
1/7/2009	0.4	Spoke with KFC about research issues for case.	YAA	\$290	\$116
1/7/2009	0.1	Spoke to CSL re: discovery stay in IJL case.	KFC	\$290	\$29
1/7/2009	2.3	Researched 2nd Circuit cases re: choice of law issues in NY and certification issues under CA law in NY; Drafted outline of memo for this topic.	KFC	\$290	\$667
1/7/2009	1.2	Researched 2nd Circuit law for motion for consolidation.	KFC	\$290	\$348

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/7/2009	1.2	Finished final draft of letter to court.	KFC	\$290	\$348
1/7/2009	2.7	Research on IJL re: diversity and certification of a nationwide class.	KFC	\$290	\$783
1/7/2009	0.4	Conversation with YAA about IJL research re: diversity and nationwide certification.	KFC	\$290	\$116
1/8/2009	0.4	Saving order from the judge in PA and confirming all other documents are saved. Email to client.	JWD	\$210	\$84
1/8/2009	0.4	Review correspondence with defense counsel in matter.	JGB	\$690	\$276
1/8/2009	1.4	T/c w/Angel Velasquez (former head of nat'l sales at IJL ? Fla. Call Ctr) re: deceptive sales & training at IJL; willing to meet in person & discuss further.	JLN	\$520	\$728
1/9/2009	0.6	Voicemail left by reporter; return phone call to reporter; discuss with outside counsel.	JGB	\$690	\$414
1/9/2009	0.5	Editing motion to consolidate.	JWD	\$210	\$105
1/9/2009	1.3	F/u call w/A.Velasquez to discuss IJL's fraudulent practices and training	JLN	\$520	\$676
1/9/2009	0.1	Email to client.	JWD	\$210	\$21
1/11/2009	0.2	Review IJL plans and e-mail CSL.	JGB	\$690	\$138
1/12/2009	0.2	Case meeting with CSL and JWD.	KFC	\$290	\$58
1/12/2009	0.2	Case meeting with KFC and JWD.	CSL	\$570	\$114
1/12/2009	0.2	Case meeting with CSL and KFC.	JWD	\$210	\$42
1/13/2009	0.1	E-mail to and from journalist.	JGB	\$690	\$69
1/13/2009	0.1	Reviewed letter to court for KFC.	YAA	\$290	\$29
1/13/2009	2.1	Correcting and editing letter to court and motion for extension.	KFC	\$290	\$609

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/13/2009	0.2	Discussing case.	JWD	\$210	\$42
1/14/2009	0.1	Proofreading letter to court; Printing final copy.	KFC	\$290	\$29
1/14/2009	1.4	Line editing Woolf complaint for clerical errors; Editing causes of action section of the complaint; Printing final copy.	KFC	\$290	\$406
1/14/2009	1.3	Updating Andrew Woolf's complaint.	JWD	\$210	\$273
1/14/2009	1.2	E-mails to and from journalist; meeting with journalist and producer regarding matter.	JGB	\$690	\$828
1/14/2009	0.25	F/u call w/A. Torrance re: IJL's sales practices/techniques	JLN	\$520	\$130
1/15/2009	0.3	Discuss possible settlement strategies with outside counsel.	JGB	\$690	\$207
1/15/2009	2.1	Drafting conclusion and lead counsel section for motion for consolidation; Editing conclusion.	KFC	\$290	\$609
1/15/2009	0.9	Editing and re-formatting motions to consolidate.	JWD	\$215	\$194
1/15/2009	0.6	Responding to email from client. Writing an email to class members. Reading and replying to client email.	JWD	\$215	\$129
1/16/2009	0.2	Briefly review proposed pleadings and letter.	JGB	\$690	\$138
1/16/2009	0.6	Discussion with KFC and CSL about case. Email to client. Scanning and saving documents from client.	JWD	\$215	\$129
1/16/2009	1.1	E-mail from M. LePage requesting call, t/c re: developments with IJL in Florida, setting up meeting in person	JLN	\$520	\$572
1/18/2009	1.2	Review and edit letter, motions, and complaint.	JGB	\$690	\$828
1/19/2009	1.1	Emails to Jon Norinsberg and to the other side.	CSL	\$590	\$649
1/20/2009	1.4	Call with Andy Woolf and calls to JLN.	CSL	\$590	\$826

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/20/2009	2.3	Editing Motions for Consolidation.	SCB	\$195	\$449
1/21/2009	0.2	Discuss with CSL tactical steps re: pushing into discovery.	JGB	\$690	\$138
1/21/2009	0.3	Call with JLN.	CSL	\$590	\$177
1/21/2009	2.6	Line editing complaint; Began research re: 41(g) lead counsel argument for motion to consolidate.	KFC	\$290	\$754
1/22/2009	0.2	Spoke to CSL re: writing a letter to court about Bari Klein.	KFC	\$290	\$58
1/22/2009	2.6	Editing motion for consolidation re: lead counsel argument.	KFC	\$290	\$754
1/22/2009	3.1	Research re: 41(g) lead counsel requirement; Reading through cases.	KFC	\$290	\$899
1/22/2009	2.1	Review earlier pleadings, discovery issues, and potential informants' information; discuss tactical issues with of counsel.	JGB	\$690	\$1,449
1/22/2009	2.3	Editing notice of motion and memo in support of motion for consolidation.	JWD	\$215	\$495
1/23/2009	0.9	Edits to letter to court.	KFC	\$290	\$261
1/23/2009	3.3	Proofreading and editing consolidation motion memo.	KFC	\$290	\$957
1/23/2009	1.1	Read through CSL emails with opposing counsel; Drafted letter to court re: discovery schedule.	KFC	\$290	\$319
1/23/2009	2.2	Editing motions to consolidate and updating Andrew Woolf complaint. Editing proposed order for consolidation.	JWD	\$215	\$473
1/26/2009	0.2	Discuss discovery follow up with CSL.	JGB	\$690	\$138
1/26/2009	0.6	Editing notices of motion for consolidation. Case meeting to discuss case.	JWD	\$215	\$129
1/27/2009	1.8	Researched dossiers.	SCB	\$195	\$351

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/27/2009	0.9	Line edit complaint.	GB	\$265	\$239
1/27/2009	2.6	Research on Riverside principles and IJL board of directors. Adding contact information to PA. Sending documents to CSL. Phone call with CSL.	JWD	\$215	\$559
1/27/2009	7.1	Traveling to Miami for interview and preparation for interview.	CSL	\$590	\$4,189
1/28/2009	0.3	Checking on CSL's flight information.	JWD	\$215	\$65
1/28/2009	3.6	Discuss discovery and investigation issues and next steps with CSL; review previous discovery issues and disputes; research discovery standard; discuss with outside counsel.	JGB	\$690	\$2,484
1/28/2009	15.9	Preparation for interviews with witnesses, interviews with witnesses, traveling to interviews with witnesses, email exchange with Bari Klein, discussions on how to push into discovery with JN and JGB and traveling back to New York from Miami.	CSL	\$590	\$9,381
1/29/2009	3.7	Discussions on letter to the Court and with JGB and YAA and JLN.	CSL	\$590	\$2,183
1/29/2009	0.3	Discuss tactical and discovery issues with CSL.	JGB	\$690	\$207
1/30/2009	1.1	Editing and putting together exhibits for letter to court. Faxing letter to court.	JWD	\$215	\$237
1/30/2009	2.6	Re-drafting letter to court re: discovery and Bari Klein; Emailing JLN re: letter; Discussing letter with JLN on phone; Editing letter.	KFC	\$290	\$754
1/30/2009	1.5	Drafting letter to court re: discovery and Bari Klein.	KFC	\$290	\$435
2/3/2009	0.7	Discuss interview, tactical, and discovery issues with of counsel.	JGB	\$690	\$483
2/4/2009	0.2	Phone call with JLN re: Bari Klein's response.	KFC	\$290	\$58

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/4/2009	0.6	Discuss tactical issues with outside counsel.	JGB	\$690	\$414
2/4/2009	0.4	Discussions with JGB regarding the other side's letter.	CSL	\$590	\$236
2/4/2009	0.3	Reading through, saving, and discussing letter from opposing counsel with KFC.	JWD	\$215	\$65
2/5/2009	1.3	Draft and filing letter to Court.	CSL	\$590	\$767
2/5/2009	0.2	General case meeting with JGB.	CSL	\$590	\$118
2/5/2009	2.9	Email to clients and class members. Emails with JLN. Putting together new document demands. Reading over and editing letter to Court. Printing out, editing, scanning in, and sending discovery demands to opposing counsel. Editing, scanning, and submitted letter to the Court.	JWD	\$215	\$624
2/5/2009	2.6	Began reviewing Membership Consultant Business Manual, South Florida, 2008 (sent by M. LePage); took notes re: same	JLN	\$520	\$1,352
2/5/2009	0.1	Reviewed letter to Court re: discovery schedule	JLN	\$520	\$52
2/6/2009	4.25	Continued reviewing Membership Consultant Business Manual, South Florida, 2008; took notes re: same	JLN	\$520	\$2,210
2/8/2009	1.9	Finished reviewing Membership Consultant Business Manual, South Florida, 2008; took notes re: same	JLN	\$520	\$988
2/9/2009	0.2	Cases meeting.	CSL	\$590	\$118
2/9/2009	3.2	Preparation of questions/outline of all issues to cover with former IJL employees during interviews	JLN	\$520	\$1,664
2/9/2009	2.5	Travel to Fla. to meet w/former IJL employees M. LePage, A. Velasquez & Alexander Reese (5.0)	JLN	\$520	\$1,300

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/10/2009	1.8	Began reviewing Coordinator Manual, Hallandale Beach, 2008 (from M.LePage); Took notes re: same	JLN	\$520	\$936
2/10/2009	2.9	Interview w/A. Velasquez	JLN	\$520	\$1,508
2/10/2009	1	Interview w/Alexander Reese	JLN	\$520	\$520
2/10/2009	2.5	Travel back to NYC (5.0)	JLN	\$520	\$1,300
2/10/2009	2.5	Interview w/M.LePage	JLN	\$520	\$1,300
2/11/2009	0.4	Emails to JLN and review of previous letters to Court.	CSL	\$590	\$236
2/11/2009	3.6	Continued reviewing Coordinator Manual, Hallandale Beach, 2008; took notes re: same	JLN	\$520	\$1,872
2/11/2009	3.7	Prepared summary of interviews w/M. LePage, A.Velasquez & A .Reese	JLN	\$520	\$1,924
2/12/2009	0.3	Discuss tactical issues with of counsel.	VFB	\$390	\$117
2/12/2009	0.3	Discuss tactical issues with of counsel.	JGB	\$690	\$207
2/12/2009	0.3	Discuss tactical issues in case.	CSL	\$590	\$177
2/13/2009	0.7	Meeting with JLN, discussions with legal staff on how to move case forward.	CSL	\$590	\$413
2/13/2009	1.3	Finished review of Coordinator Manual, Hallandale Beach, 2008; took notes re: same	JLN	\$520	\$676
2/14/2009	0.3	Discuss tactical issues with of counsel.	JGB	\$690	\$207
2/14/2009	0.2	Reviewed e-mail and attachments from Karen Mallen re: IJL ads in CareerBuilder.com (describing director's position as a sales position)	JLN	\$520	\$104
2/16/2009	0.3	Phone call with reporter re: story; e-mail to CSL and JWD	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/17/2009	0.6	PA saving court order and recommendation. Printing out cases for CSL and reading through recommendation.	JWD	\$215	\$129
2/17/2009	4.5	General case meeting, review of court decision, calls with JN and discussion with JGB, review of cases cited.	CSL	\$590	\$2,655
2/17/2009	0.8	Discuss case strategy, including settlement, with of counsel.	VFB	\$390	\$312
2/17/2009	0.8	Discuss case strategy, including settlement, with of counsel.	JGB	\$690	\$552
2/17/2009	0.1	Reviewed Order re parties requests for a case management plan	JLN	\$520	\$52
2/17/2009	0.7	Reviewed Report and Recommendations that defendants' motion to dismiss the plaintiffs' complaint be granted, except as it relates unjust enrichment; took notes re: same	JLN	\$520	\$364
2/18/2009	0.3	Discuss settlement tactics with outside plaintiff's lawyer.	JGB	\$690	\$207
2/19/2009	1.3	Updated summary document.	KFC	\$290	\$377
2/20/2009	0.3	Reviewing IJL summary document to submit to JGB.	KFC	\$290	\$87
2/21/2009	7.3	Drafting objections to report and recommendation.	CSL	\$590	\$4,307
2/21/2009	0.4	Discuss tactical, motion, and discovery issues with JGB.	VFB	\$390	\$156
2/21/2009	0.4	Discuss tactical, motion, and discovery issues with VFB.	JGB	\$690	\$276
2/22/2009	0.2	E-mail exchange with Marc Natale regarding Objections to R&R	JLN	\$520	\$104
2/22/2009	1.8	Discuss range of tactical and motion issues with JGB.	VFB	\$390	\$702

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/22/2009	1.8	Discuss range of tactical and motion issues with VM.	JGB	\$690	\$1,242
2/23/2009	0.2	Email to potential class member.	JWD	\$215	\$43
2/24/2009	0.2	Discuss case at case meeting.	JWD	\$215	\$43
2/24/2009	1.7	Putting together Objections to Recommendation.	JWD	\$215	\$366
2/25/2009	2.1	Changes to Objections to magistrate judge's decision.	CSL	\$590	\$1,239
2/25/2009	0.4	Discussion with potential class member.	JWD	\$215	\$86
2/25/2009	2.1	Review discovery and tactical issues with CSL; review and edit objections to report and recommendation.	JGB	\$690	\$1,449
2/26/2009	3.1	Discussions with JGB and revisions to the Objections, discussions with outside attorneys on Judge's procedures.	CSL	\$590	\$1,829
2/26/2009	0.4	Discuss report and recommendation with of counsel.	VFB	\$390	\$156
2/26/2009	1.9	Editing Objections to Recommendation.	JWD	\$215	\$409
2/26/2009	0.9	Discuss, review, and edit report and recommendation objections; discuss next steps with of counsel.	JGB	\$690	\$621
2/27/2009	0.6	Discuss discovery and tactical issues with of counsel.	JGB	\$690	\$414
2/27/2009	0.6	Discuss discovery and tactical issues with of counsel.	VFB	\$390	\$234
2/27/2009	3.1	Changes to the Objections to the Report, discussions with JGB and JWD on filing the objections.	CSL	\$590	\$1,829
2/27/2009	2.4	Editing and filing objections to Report and Recommendations.	JWD	\$215	\$516

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/1/2009	0.6	Discuss complaint and tactical issues with of counsel.	JGB	\$690	\$414
3/1/2009	0.6	Discuss complaint and tactical issues with of counsel.	VFB	\$390	\$234
3/2/2009	1.3	Delivering courtesy copy of Objections to Court. Email and phone call to potential class members.	JWD	\$215	\$280
3/2/2009	0.2	Discuss case in case meeting.	JWD	\$215	\$43
3/3/2009	0.7	Discussions with JGB and with JWD on filing, review of updated letter and objections.	CSL	\$590	\$413
3/3/2009	2.1	Reformatting objections to report and recommendation. Filing them via ECF. Printing out courtesy copy for Judge. Phone call with Rachel Melneker. Discussion with CSL.	JWD	\$215	\$452
3/3/2009	1.1	Research private equity company interest in company; discuss settlement, MTD, and potential class cert issues with CSL and outside counsel.	JGB	\$690	\$759
3/3/2009	0.9	Reviewed Defendants' Objections to R & R regarding Unjust Enrichment; took notes re: same	JLN	\$520	\$468
3/5/2009	0.2	Discuss with of counsel discovery issues.	JGB	\$690	\$138
3/5/2009	0.2	Discuss with of counsel discovery issues.	VFB	\$390	\$78
3/12/2009	0.1	Read Judge Stein's Order adopting MG Fox's Findings	JLN	\$520	\$52
3/14/2009	1.2	Discuss new pleading and settlement strategy with of counsel.	VFB	\$390	\$468
3/14/2009	1.2	Discuss new pleading and settlement strategy with of counsel.	JGB	\$690	\$828
3/15/2009	0.7	Discuss settlement strategies with outside counsel.	JGB	\$690	\$483

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/16/2009	0.7	Discussions with JGB and with JWD on amending the complaint.	CSL	\$590	\$413
3/16/2009	4.6	Reaching out to clients. Editing Andrew Woolf section of complaint. Re-formatting second amended complaint. Discussion with CSL.	JWD	\$215	\$989
3/16/2009	1.7	Discuss settlement and piercing veil issues with outside counsel; review piercing veil research.	JGB	\$690	\$1,173
3/17/2009	0.4	Discussions with JWD and call to client.	CSL	\$590	\$236
3/17/2009	3.3	Emails with clients. Call with clients. Drafting second amended complaint.	JWD	\$215	\$710
3/18/2009	1.6	Working on IJL amended complaint.	JWD	\$215	\$344
3/18/2009	2.3	Research CA causes of action.	GB	\$265	\$610
3/18/2009	2.5	Investigate Riverside as a potential defendant.	GB	\$265	\$663
3/19/2009	0.6	Discuss settlement tactics with of counsel.	JGB	\$690	\$414
3/19/2009	0.6	Discuss settlement tactics with of counsel.	VFB	\$390	\$234
3/19/2009	2.2	Working on amended complaint. Communication with plaintiffs.	JWD	\$215	\$473
3/22/2009	3.3	Research connections between Riverside and It's Just Lunch; devise settlement strategy; discuss with CSL; reach out to journalist.	JGB	\$690	\$2,277
3/23/2009	1.7	Correspondence with client. Working on second amended complaint.	JWD	\$215	\$366
3/23/2009	0.6	Reading through emails. PA saving Riverside website research. Email to JGB.	JWD	\$215	\$129
3/23/2009	0.8	Review and edit complaint; review summary doc.	JGB	\$690	\$552
3/24/2009	0.1	Discuss case at case meeting.	JWD	\$215	\$22

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/24/2009	3.9	Updating Riverside section of complaint. Updating Plaintiffs' section of complaint. Discussion with client re: her experience with IJL.	JWD	\$215	\$839
3/24/2009	2.2	Review and edit complaint; e-mail to JWD and CSL re: complaint.	JGB	\$690	\$1,518
3/25/2009	0.3	Reading through JGB's edits on second amended complaint.	JWD	\$215	\$65
3/26/2009	3.8	Updating complaint draft with JGB's edits.	JWD	\$215	\$817
3/26/2009	1.1	Updated and edited IJL summary document.	KFC	\$290	\$319
3/26/2009	0.7	Discuss settlement strategy with of counsel.	VFB	\$390	\$273
3/26/2009	0.7	Discuss settlement strategy with of counsel.	JGB	\$690	\$483
3/27/2009	2.6	Finishing draft of complaint for JGB.	JWD	\$215	\$559
3/27/2009	4.7	Review, edit, and make additions to complaint; review RICO and California statutes; e-mail JWD and CSL; discuss settlement and class cert issues with outside lawyers.	JGB	\$690	\$3,243
3/29/2009	1.4	Discuss complaint filing with CSL; e-mails between CSL and JLN; review piercing corporate veil analysis; review complaint.	JGB	\$690	\$966
3/30/2009	0.6	Review of emails and discussions with JWD on filing.	CSL	\$590	\$354
3/30/2009	4.9	Putting in JGB's edits for SAC.	JWD	\$215	\$1,054
3/30/2009	0.5	Email to potential Class member. Putting together engagement letter.	JWD	\$215	\$108
3/30/2009	0.1	Read Judge Stein's Order reversing MJ Fox & reinstating fraudulent inducement claim	JLN	\$520	\$52
3/30/2009	1.1	Review and edit complaint; discuss with CSL.	JGB	\$690	\$759
3/31/2009	0.1	Spoke with JWD about RICO claims.	YAA	\$290	\$29

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/31/2009	2.1	Review of drafts of Amended Complaint.	CSL	\$590	\$1,239
3/31/2009	7.1	Working on SAC.	JWD	\$215	\$1,527
4/1/2009	2.7	Final review of documents and filing the Complaint.	CSL	\$590	\$1,593
4/1/2009	0.3	Updated and edited summary document.	KFC	\$290	\$87
4/1/2009	1.3	Photocopy and otherwise prepare amended complaint for filing.	DWW	\$215	\$280
4/1/2009	7.3	Finishing SAC. Filing SAC.	JWD	\$215	\$1,570
4/1/2009	2.4	Reviewed Second Amended Complaint; made edits to same	JLN	\$520	\$1,248
4/1/2009	2.3	Review and edit complaint, discuss filing and service with JWD, discuss complaint issues with CSL, JWD, and JLN.	JGB	\$690	\$1,587
4/2/2009	0.3	Discuss strategic issues and next steps with of counsel.	VFB	\$390	\$117
4/2/2009	0.3	Discuss strategic issues and next steps with of counsel.	JGB	\$690	\$207
4/2/2009	0.6	Researching service issues for SAC.	JWD	\$215	\$129
4/2/2009	0.6	Saving SAC and emailing to JLN.	JWD	\$215	\$129
4/3/2009	0.3	Travel to SDNY to submit summonses.	DWW	\$215	\$65
4/3/2009	1.5	Putting together summons for Riverside and Schlachet. Submitting summons at SDNY.	JWD	\$215	\$323
4/3/2009	0.3	Putting together engagement letter and sending it to potential class member.	JWD	\$215	\$65
4/3/2009	4.1	Discussions with potential hires and Paesan dinner.	CSL	\$590	\$2,419

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/3/2009	0.9	Discuss discovery, complaint filing, and settlement with CSL; review Riverside involvement in IJL.	JGB	\$690	\$621
4/4/2009	0.7	Discuss settlement and discovery strategies with outside counsel.	JGB	\$690	\$483
4/5/2009	0.3	Email to client.	JWD	\$215	\$65
4/6/2009	2.3	Review of MTD and service issues; research into Riverside; discussion of possible settlement with CSL.	JGB	\$690	\$1,587
4/6/2009	1.1	Discussions with JGB regarding settlement and next steps in the litigation.	CSL	\$590	\$649
4/7/2009	0.8	Discussion of settlement and strategy issues with CSL; review of discovery issues in anticipation of meeting.	JGB	\$690	\$552
4/7/2009	0.2	Email to class member.	JWD	\$215	\$43
4/8/2009	3.1	Discuss possible settlement and discovery issues with entire case team; phone calls to and from defense counsel re settlement and discovery; discuss settlement strategy with CSL; meet with CSL and JLN to discuss case strategy.	JGB	\$690	\$2,139
4/8/2009	2.7	Calls with Bari Klein and meetings with JLN and JGB on settlement and next steps.	CSL	\$590	\$1,593
4/9/2009	0.6	Discuss resolution with CSL; review earlier correspondence.	JGB	\$690	\$414
4/9/2009	0.8	Discuss settlement and discovery issues with VFB.	VFB	\$390	\$312
4/9/2009	0.8	Discuss settlement and discovery issues with VFB.	JGB	\$690	\$552
4/9/2009	0.1	Creating cases spreadsheet and checking with KFC and YAA re: 26f letter.	SS	\$215	\$22
4/10/2009	0.6	Discussions with Nicoletti and Harris re: service. Printing another copy of complaint for service.	JWD	\$215	\$129

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/10/2009	0.1	Editing cases spreadsheet.	SS	\$215	\$22
4/13/2009	0.4	Discuss discovery and settlements strategies with VFB.	JGB	\$690	\$276
4/14/2009	0.6	Discuss service and discovery strategies with VFB.	JGB	\$690	\$414
4/14/2009	0.3	Reading through and saving fax from opposing counsel.	JWD	\$215	\$65
4/15/2009	0.4	Discuss jury and settlements strategies with VFB.	JGB	\$690	\$276
4/15/2009	0.5	Call with Nicoletti & Harris re: service. Reading through and saving fax from opposing counsel. Discussion with CSL.	JWD	\$215	\$108
4/16/2009	0.2	Review service issues; discuss settlements strategies with VFB.	JGB	\$690	\$138
4/20/2009	0.1	Case meeting with CSL and staff.	KFC	\$290	\$29
4/20/2009	0.3	Review and plan possible resolution issues.	JGB	\$690	\$207
4/22/2009	0.7	Discussions with adversary and with JGB on call from new adversary.	CSL	\$590	\$413
4/23/2009	0.9	Email to adversary and discussions with staff on new adversary.	CSL	\$590	\$531
4/23/2009	0.4	Discussion with CSL.	JWD	\$215	\$86
4/23/2009	1.3	Discuss with CSL possible discovery schedule; review piercing the veil materials	JGB	\$690	\$897
4/24/2009	0.1	Discuss with CSL possible discovery plan.	JGB	\$690	\$69
4/27/2009	0.7	Email to JLN and emails to JGB on summer plan of attack.	CSL	\$590	\$413
4/27/2009	0.2	Review next steps and update sum doc.	JGB	\$690	\$138
4/28/2009	0.4	Drafting press release.	JWD	\$215	\$86

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/28/2009	0.2	Read email from an attorney in Canda re: our case and sent an email to JGB, CSL and JGB.	SS	\$215	\$43
4/28/2009	0.2	Review case status and next steps.	JGB	\$690	\$138
4/29/2009	3.2	Drafted class certification brief.	KFC	\$290	\$928
4/29/2009	0.6	Discussion with JGB, CSL and KFC re: lawsuit in Canada. Online research re: attorney who reached out re: information and status of the case.	SS	\$215	\$129
4/29/2009	0.3	Review case status and next steps; speak to CSL re: possible resolution.	JGB	\$690	\$207
4/30/2009	0.7	Meeting with Pamela Grayson. Emails with CSL and JGB.	JWD	\$215	\$151
4/30/2009	0.7	Updated summary document.	KFC	\$290	\$203
4/30/2009	0.4	Continued work on class certification draft; Spoke to BI re: completion of the draft.	KFC	\$290	\$116
4/30/2009	0.1	Meet with CSL to discuss procedures during his vacation.	KFC	\$290	\$29
4/30/2009	0.4	E-mails to and from D/C; phone call with D/C, discussion of class cert and next steps with CSL.	JGB	\$690	\$276
5/1/2009	0.1	Reviewed Order with respect to setting to answer or move	JLN	\$520	\$52
5/4/2009	0.4	Email to all Plaintiffs. Emails with JGB.	JWD	\$215	\$86
5/4/2009	0.2	Discussed case with CSL and staff.	KFC	\$290	\$58
5/4/2009	1.1	Call with potential client and discussions with JGB and staff on settlement approaches.	CSL	\$590	\$649
5/4/2009	4.2	Lunch and long meeting with reporter; e-mail to JWD and CSL re: client contact; review of complaint before and after meeting; e-mail to defense counsel re: other reporter contact; e-mail to other reporter.	JGB	\$690	\$2,898

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/5/2009	0.2	Emails with JGB and client.	JWD	\$215	\$43
5/5/2009	3.9	Class certification.	GY	\$265	\$1,034
5/5/2009	0.2	Exchanges with potential client.	CSL	\$590	\$118
5/6/2009	0.4	Review of GY's additions to class certification draft.	KFC	\$290	\$116
5/6/2009	0.2	Discussion with GY re: class certification draft.	KFC	\$290	\$58
5/7/2009	2.1	Edited IJL class certification.	KFC	\$290	\$609
5/8/2009	1.5	Prep for meeting with JLN, meeting with JLN and discussions with JGB.	CSL	\$590	\$885
5/11/2009	0.1	Speak to CSL and MJN re: assignments in matter.	JGB	\$690	\$69
5/12/2009	0.1	Reviewed and edited class cert and printed it for JGB.	YAA	\$290	\$29
5/15/2009	2.1	Updating information in PA for case.	JWD	\$215	\$452
5/18/2009	0.8	Meet with outside counsel re: case strategy.	JGB	\$690	\$552
5/19/2009	1.2	E-mails to and from defense counsel; meeting with defense attorneys.	JGB	\$690	\$828
5/19/2009	0.3	Updating PA calendar dates for case.	JWD	\$215	\$65
5/20/2009	1.2	Discuss meeting with CSL; review class cert standards; review class cert decisions.	JGB	\$690	\$828
5/20/2009	0.3	Organizing files for case.	JWD	\$215	\$65
5/21/2009	1.4	Looking at our initial disclosures. Looking at local rules to determine if initial disclosures were deficient. Email to CSL.	JWD	\$215	\$301
5/26/2009	0.2	Cases meeting.	CSL	\$590	\$118

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/26/2009	1.7	Discuss next steps, including motions, with CSL and apprentice; discuss class cert concerns with CSL.	JGB	\$690	\$1,173
5/26/2009	0.2	Emailing documents to new staff.	SS	\$215	\$43
5/26/2009	0.2	Case meeting with staff re: status and future steps of case.	DWW	\$215	\$43
5/26/2009	0.7	Discuss about case with CSL and new employees. Sending documents to new employees.	JWD	\$215	\$151
5/26/2009	1.2	Read and Analyzed Case File.	JTR	\$245	\$294
5/26/2009	2.1	Familiarize self with case.	MEM	\$195	\$410
5/27/2009	0.6	Discuss case status; review with CSL class and discovery issues.	JGB	\$690	\$414
5/27/2009	0.5	General cases meeting with JGB and staff.	CSL	\$590	\$295
5/27/2009	0.3	Meeting with CSL and JGB re: case.	JWD	\$215	\$65
5/27/2009	0.4	Sit-down meeting.	JTR	\$245	\$98
5/27/2009	0.6	Prepared for sit-down with MM.	JTR	\$245	\$147
5/27/2009	0.9	Researched causes of action.	JTR	\$245	\$221
5/27/2009	2.1	Researched IJL (familiarization with website, blog, pertinent statutes).	JTR	\$245	\$515
5/27/2009	2.9	Meeting/review case.	MEM	\$195	\$566
5/28/2009	2.9	Working on amended initial disclosures. Discussing initial disclosures with CSL. Looking at judge's rules and local rules about a letter to the court re: discovery dispute.	JWD	\$215	\$624
5/29/2009	1.1	Reviewed Riverside's MTD; took notes re: same	JLN	\$520	\$572
5/29/2009	0.1	Reviewed Memorandum of Law in Support Motion to Dismiss Second Amended Complaint..	JLN	\$520	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/29/2009	0.1	Reviewed endorsed letter for permission to enlarge defendant's brief to 45 pages	JLN	\$520	\$52
5/29/2009	0.1	Reviewed Notice of Appearance by Arthur J. Margulies on behalf of Riverside Company	JLN	\$520	\$52
5/29/2009	1.9	Finish draft of letter to Court re: Bari Klein. Discussion with CSL.	JWD	\$215	\$409
6/1/2009	0.8	General cases meeting and work on global to do list.	CSL	\$590	\$472
6/1/2009	2.2	Discuss tactical, MTD, and class cert issues with CSL; review and research legal issues regarding the same.	JGB	\$690	\$1,518
6/2/2009	2.6	Discussions with potential co-counsel on working together, letter to Court on discovery issues.	CSL	\$590	\$1,534
6/2/2009	1.3	Discuss tactical issues with potential co-counsel; left phone message for defense counsel; discuss with CSL and co-counsel releasing Riverside from the case without prejudice.	JGB	\$690	\$897
6/2/2009	1.1	Legal research re: negl. misrepresentation claims In Riverside MTD	JLN	\$520	\$572
6/2/2009	1.4	Reviewed second Memorandum, of Law in Support of Motion to Dismiss Plaintiffs' Second Amended Complaint; took notes re: same	JLN	\$520	\$728
6/2/2009	0.9	Reviewed Declaration of Bari Klein in Support Second Motion to Dismiss Plaintiffs' Second Amended Complaint	JLN	\$520	\$468
6/2/2009	1.4	Legal research re: RICO arguments in Riverside's MTD	JLN	\$520	\$728
6/3/2009	0.4	Sorting emails, updating PA, and performing monthly case tune up.	JWD	\$215	\$86
6/3/2009	0.7	Amended Klein letter per CSL's suggestions.	JTR	\$245	\$172

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/3/2009	0.8	Drafted letter to Bari Klein re: service of complaints.	JTR	\$245	\$196
6/3/2009	0.3	Meeting with CSL and JWD re: service of complaints to new defendants; Researched FRCP and SDNY local rules re: service.	JTR	\$245	\$74
6/3/2009	0.3	Discussion with CSL re: case. Discussion with JTR.	JWD	\$215	\$65
6/3/2009	2.1	Updating initial disclosures. Discussion with CSL. Email to JLN.	JWD	\$215	\$452
6/3/2009	0.2	Email letter to opposing counsel.	JWD	\$215	\$43
6/3/2009	2.6	Legal research re: breach of contract & unjust enrichment claims in Riverside MTD	JLN	\$520	\$1,352
6/3/2009	1.4	Phone calls to and from defense counsel; review service issues and court status with CSL; review class cert issues.	JGB	\$690	\$966
6/4/2009	0.6	Discuss class cert and litigation strategy with of counsel.	JGB	\$690	\$414
6/4/2009	0.6	Discuss class cert and litigation strategy with of counsel.	VFB	\$390	\$234
6/4/2009	1.4	Updating initial disclosures. Discussion with CSL.	JWD	\$215	\$301
6/5/2009	0.8	Putting together and sending out stip to opposing counsel. Discussion with CSL.	JWD	\$215	\$172
6/5/2009	1.2	Researched FRCP 41(a) issue and apprised CSL of findings	JTR	\$245	\$294
6/5/2009	0.3	Sent case updates to JGB.	JTR	\$245	\$74
6/5/2009	1.3	Review stipulation and settlement issues with CSL and defense counsel, including call with defense counsel	JGB	\$690	\$897
6/5/2009	1.1	Review of Bari Klein's letter to Court and discussions with JGB on how to proceed on Monday.	CSL	\$590	\$649

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/5/2009	2.7	Finalizing stip with Riverside and negotiations on stip.	CSL	\$590	\$1,593
6/5/2009	2.3	Making seven copies of complaint. Putting together complaint, summons, and cover letter for service. Call to MFI to pick up complaints for service.	JWD	\$215	\$495
6/5/2009	0.9	Reading through IJL motion to dismiss. Discussion with CSL. Determining if Andrew Woolf is time-barred from being a plaintiff.	JWD	\$215	\$194
6/5/2009	0.7	Went to federal court for summons for new defendants and also got mail.	DMH	\$195	\$137
6/6/2009	1.4	Legal research re: GBL & Fraudulent Inducement arguments made by Riverside	JLN	\$520	\$728
6/7/2009	1.3	Review class cert, discovery, discovery management, and motion to dismiss issues and had discussions re; these issues with CSL.	JGB	\$690	\$897
6/7/2009	0.4	Strategic discussions on class cert with JGB.	CSL	\$590	\$236
6/7/2009	2.9	Research re: defendants' arguments re: fraud w/particularity requirement under Rule 9(b)	JLN	\$520	\$1,508
6/7/2009	1.7	Research re: promissory fraud, fraudulent inducement & misrepresentation	JLN	\$520	\$884
6/7/2009	2.7	Legal research re: def. arg that fraud claims are barred by existence of contract	JLN	\$520	\$1,404
6/7/2009	3.2	Legal research re: future promises v. statement of existing fact	JLN	\$520	\$1,664
6/7/2009	1.1	Legal research re: civil conspiracy argument by Riverside	JLN	\$520	\$572
6/8/2009	3.1	Prep for call with Court, call with Court and discussions with staff on next steps.	CSL	\$590	\$1,829
6/8/2009	0.3	Meeting with CSL and GMS re: 12(b)(6).	JTR	\$245	\$74

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/8/2009	3.7	Reviewed and Analyzed D/c's 12(b)(6), Shepardized cited case law.	JTR	\$245	\$907
6/8/2009	1.1	Review defendant's brief; discuss court appearance with CSL; discuss MTD briefing scheduling with CSL.	JGB	\$690	\$759
6/8/2009	3.2	Legal research re: defendants' argument about RICO claims under 18 U.S.C. 1962	JLN	\$520	\$1,664
6/8/2009	2.75	Legal research re: scienter requirement for fraud	JLN	\$520	\$1,430
6/8/2009	0.1	Reviewed Order staying discovery pending the resolution of outstanding dispositive motions	JLN	\$520	\$52
6/8/2009	0.1	Reviewed Minute Entry for proceedings held before Magistrate Judge Kevin Nathaniel Fox: Telephone Status Conference held on 6/8/2009. (to) Modified on 7/9/2009	JLN	\$520	\$52
6/8/2009	1.6	Research re: defendants' arguments re: negligent misrepresentation	JLN	\$520	\$832
6/8/2009	0.3	Reviewed Stipulation of voluntary dismissal against Riverside Company, Loren Schlachet pursuant to Rule 41(a)(1)(A)(ii)	JLN	\$520	\$156
6/8/2009	0.3	Telephone Status Conference held on 6/8/2009. All pretrial discovery activities are stayed until the resolution of the pending dispositive motion(s) in the case	JLN	\$520	\$156
6/8/2009	7.4	Read complaint and got familiar with motion to dismiss for meeting with CSL and continued briefing the motion to dismiss in preparation for drafting of opposition papers.	GMS	\$245	\$1,813
6/9/2009	0.2	Meeting with CSL.	JTR	\$245	\$49
6/9/2009	0.8	Discussion with CSL. Looking at Woolf section of second amended complaint.	JWD	\$215	\$172

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/9/2009	3.3	Discuss MTD issues with CSL, including charge of factually inaccurate statements; review commonality issues in treatise.	JGB	\$690	\$2,277
6/9/2009	2.9	Began and continued to work on outline for Opposition to Motion to Dismiss; due 6/11/09.	GMS	\$245	\$711
6/9/2009	0.2	Met with CSL re dividing workload for Opposition to Motion to Dismiss.	GMS	\$245	\$49
6/10/2009	1.4	Review class action treatise on class action concerns including commonality.	JGB	\$690	\$966
6/10/2009	2.9	Discuss MTD issues with CSL, including charge of factually inaccurate statements, review statute of limitation concerns; research MTD on claims.	JGB	\$690	\$2,001
6/10/2009	0.1	Reviewed memo endorsement on Stipulation of dismissal	JLN	\$520	\$52
6/10/2009	1.7	Continued research re: defendants' arguments under GBL 350	JLN	\$520	\$884
6/10/2009	2.8	Research re: defendants' breach of contract arguments in MTD	JLN	\$520	\$1,456
6/10/2009	2.1	Legal research re: defendants' arguments about unjust enrichment	JLN	\$520	\$1,092
6/10/2009	6.7	Continued to work on outline for Opposition to Motion to Dismiss; due 6/11/09.	GMS	\$245	\$1,642
6/11/2009	4.1	Draft of MTD opposition.	CSL	\$590	\$2,419
6/11/2009	6.2	Researched and drafted memo on 12(b)(6) and false advertising, unjust enrichment, b/k, civil conspiracy, and Rule 11.	JTR	\$245	\$1,519
6/11/2009	3.2	Researched and drafted memo on 12(b)(6) and RICO.	JTR	\$245	\$784
6/11/2009	1.4	Review draft of response to MTD; discuss MTD issues with CSL.	JGB	\$690	\$966

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/11/2009	1.6	Legal research re: defendants' arguments for Unfair Competition Law	JLN	\$520	\$832
6/11/2009	3.2	Legal research re: defendants' civil conspiracy arguments/claims	JLN	\$520	\$1,664
6/11/2009	2.9	Legal research re: defendants' arguments about California claims	JLN	\$520	\$1,508
6/11/2009	2.4	Continued to work on outline for Opposition to Motion to Dismiss; due today.	GMS	\$245	\$588
6/12/2009	0.9	Class Cert. Brief Revisions.	JTR	\$245	\$221
6/12/2009	1.7	Discuss MTD issues with CSL; review earlier memo on MTD and statute of limitations.	JGB	\$690	\$1,173
6/12/2009	2.75	Legal research re: defendants claims re Actual Fraud under Cal. Code	JLN	\$520	\$1,430
6/12/2009	2.8	Legal research re: defendants' arguments on plaintiffs' false advertising claim under California Law	JLN	\$520	\$1,456
6/12/2009	1.4	Legal research re: defendants' claims re: Wilful Deception under California Code	JLN	\$520	\$728
6/12/2009	0.3	For CSL: look into Biondi v. Beekman Hill House Apartment Corp., 257 A.D.2d 76, 692 N.Y.S.2d 304 (N.Y.A.D. 1999) - reasonable to use it in a 12(b)(6) motion?	GMS	\$245	\$74
6/13/2009	1.4	Compiled all cases into bound volume; highlighted case law for potential use in our opposition brief to defendants' MTD	JLN	\$520	\$728
6/13/2009	2.7	Legal research re: defendants requests that costs should be imposed under Rule 11	JLN	\$520	\$1,404
6/13/2009	2.6	Legal research re: defendants' claims that plaintiffs should not be entitled to amend complaint for a third time	JLN	\$520	\$1,352
6/14/2009	2.4	Changes to MTD draft.	CSL	\$590	\$1,416

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/15/2009	6.4	Changes on MTD.	CSL	\$590	\$3,776
6/15/2009	3.8	Review earlier chart, correspondence, and briefs; discuss with CSL; review and edit brief; e-mail to CSL.	JGB	\$690	\$2,622
6/15/2009	2.3	Putting together statement of facts for opposition to motion to dismiss. Discussion with CSL. Formatting Opposition.	JWD	\$215	\$495
6/15/2009	1.7	Listed all facts alleged by B. Klein in 12(b)(6) w/ GMS.	JTR	\$245	\$417
6/15/2009	1.4	Additional work for CSL on false/misleading statement by opposing counsel in motion to dismiss.	GMS	\$245	\$343
6/15/2009	1.6	Research assignment for CSL re statute of limitations tolling and CA consumer fraud laws.	GMS	\$245	\$392
6/15/2009	0.2	Meeting with CSL re next steps.	GMS	\$245	\$49
6/15/2009	2.1	Facts cataloguing assignment from CSL.	GMS	\$245	\$515
6/15/2009	0.9	Meeting with CSL, JTR, and JWD re: motion to dismiss.	MEM	\$195	\$176
6/16/2009	5.1	Changes to the MTD.	CSL	\$590	\$3,009
6/16/2009	5.2	Review and edit motion to dismiss brief; e-mail to CSL re: series of ideas re: brief, MTD generally, and class cert.	JGB	\$690	\$3,588
6/16/2009	3.2	Putting in edits for opposition to motion to dismiss. Discussion with CSL. Formatting opposition to motion to dismiss.	JWD	\$215	\$688
6/17/2009	6.9	Working on opposition to motion to dismiss. Discussion with CSL.	JWD	\$215	\$1,484
6/17/2009	1.9	Factual parentheticals + revisions for 12(b)(6) opp.	JTR	\$245	\$466

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/17/2009	6.9	Final changes to Opposition to motion to dismiss.	CSL	\$590	\$4,071
6/17/2009	4.9	Review and heavily edit opposition brief; review earlier briefs and cases; legal research for MTD.	JGB	\$690	\$3,381
6/18/2009	0.2	Email to potential class member.	JWD	\$215	\$43
6/18/2009	3.5	Editing opposition to motion to dismiss. Discussion with CSL and GMS.	JWD	\$215	\$753
6/18/2009	4.7	Final edits to MTD.	CSL	\$590	\$2,773
6/18/2009	0.9	Review opposition brief and appendix; discuss issues with CSL.	JGB	\$690	\$621
6/18/2009	2.1	Bluebooking/cite checking opposition to motion to dismiss.	GMS	\$245	\$515
6/18/2009	1.2	Standard for pleading with particularity research for CSL.	GMS	\$245	\$294
6/19/2009	4.3	Editing and re-formatting opposition to motion to dismiss. Discussion with CSL, DWW, GMS, and DMH. Filing opposition to motion to dismiss.	JWD	\$215	\$925
6/19/2009	1.1	Final co-ordination in getting brief reviewed and filed.	CSL	\$590	\$649
6/19/2009	0.2	Touch base with case team re: brief filing.	JGB	\$690	\$138
6/19/2009	1.9	Made edits to opposition to motion to dismiss and finished cite checking.	GMS	\$245	\$466
6/19/2009	0.1	Final Review of Memorandum of Law in Opposition to second motion to dismiss Plaintiffs' Second Amended Complaint	JLN	\$520	\$52
6/19/2009	0.7	Editing files with JWD.	DMH	\$195	\$137
6/22/2009	2.2	Class Cert Brief	JTR	\$245	\$539

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/22/2009	1.6	Reviewed defendants' response to plaintiff's first request for production of documents; made notes re: same; flagged objections which may necessitate motion to compel after stay is lifted	JLN	\$520	\$832
6/23/2009	8.6	Class Cert Brief.	JTR	\$245	\$2,107
6/24/2009	2.3	Revised Class Cert. Brief.	JTR	\$245	\$564
6/24/2009	1.1	Phone call with potential class member. Entering contact information. Putting together engagement letter.	JWD	\$215	\$237
6/24/2009	0.2	Discussion with JGB and CSL re: case.	JWD	\$215	\$43
6/26/2009	0.2	Email to MFI re: service on IJL Franchises.	JWD	\$215	\$43
6/27/2009	1.2	Review Second Circuit class cert decisions	JGB	\$690	\$828
6/28/2009	4.9	Review Second Circuit class cert decisions; review class action treatise on class cert issues	JGB	\$690	\$3,381
6/30/2009	2.2	Review and edit class cert brief	JGB	\$690	\$1,518
7/1/2009	0.3	Doing monthly case tune up.	JWD	\$215	\$65
7/3/2009	3.9	Review and edit class cert brief	JGB	\$690	\$2,691
7/4/2009	2.3	Review and edit class cert brief	JGB	\$690	\$1,587
7/6/2009	0.8	Reviewed reply memorandum of law in support second motion to dismiss	JLN	\$520	\$416
7/8/2009	2.3	Discuss with CSL plaintiff and scheduling issues; discuss class cert concerns; review class cert damages issues; review and edit class cert brief	JGB	\$690	\$1,587
7/8/2009	1.6	Review and edit class cert brief	JGB	\$690	\$1,104
7/8/2009	1	Meeting w/BP and SA re: response to Def. MTD., response to their disc. demands	JLN	\$520	\$520
7/9/2009	1.1	Calls to Bari Klein and call to court over ECF error which listed a conference on 7/8/09.	CSL	\$590	\$649

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/10/2009	0.2	Phone call to potential client.	JWD	\$215	\$43
7/13/2009	0.2	General cases meeting.	CSL	\$590	\$118
7/13/2009	0.9	Phone call with potential class member. Putting together engagement letter.	JWD	\$215	\$194
7/16/2009	0.4	Editing engagement letter. Discussion with MJN. Sending engagement letter to potential client.	JWD	\$215	\$86
7/20/2009	1.3	Discussion with CSL. Looking into what needs to be done prior to settlement conference. Follow up with MFI re: service on franchises.	JWD	\$215	\$280
7/21/2009	0.9	Following up with MFI re: service on franchises. Discussion with CSL. Phone call with opposing counsel.	JWD	\$215	\$194
7/22/2009	0.4	Discussion with CSL. Email to opposing counsel. Discussion with MFI.	JWD	\$215	\$86
7/22/2009	0.1	Reviewed Order settlement conference previously scheduled for August 18, 2009 is cancelled	JLN	\$520	\$52
7/28/2009	0.1	Class member intake – left message	GMS	\$245	\$25
7/29/2009	0.1	Class member intake call – straight to voicemail	GMS	\$245	\$25
7/31/2009	3.2	Class Cert Rev'n.	JTR	\$245	\$784
8/3/2009	0.4	Doing monthly case tune up.	JWD	\$215	\$86
8/4/2009	0.4	Writing emails to Class members.	JWD	\$215	\$86
8/6/2009	0.3	Emails with a Class member.	JWD	\$215	\$65
8/10/2009	0.4	General cases meeting with JGB.	CSL	\$590	\$236
8/18/2009	0.2	Review Klein letter and judge's endorsed order; e-mail staff	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/24/2009	0.4	Discussion with MJN. Emails with potential class members.	JWD	\$215	\$86
8/25/2009	0.9	Discussion with potential class member. Putting together and sending out engagement letter. Emails with potential class member.	JWD	\$215	\$194
8/26/2009	0.5	Discuss with JWD stipulation; e-mailing to and from defense counsel re: stip; touch base with plaintiff's attorney involved in similar investigation, discuss with JWD.	JGB	\$690	\$345
8/26/2009	0.5	Phone call with opposing counsel. Discussion with JGB. Email to opposing counsel.	JWD	\$215	\$108
8/31/2009	0.6	Looking through docket to see if dates had been postponed. Discussion with CSL.	JWD	\$215	\$129
9/2/2009	0.3	Perform monthly tune-up.	JWD	\$225	\$68
9/5/2009	2.4	Review of correspondence, service issues, and complaint in prep for new staff	JGB	\$690	\$1,656
9/8/2009	0.3	Discuss next steps in matter with CSL and SRG	JGB	\$690	\$207
9/8/2009	0.5	Reviewing It's Just Lunch Summary Docs, complaint filed, related documents.	AM	\$270	\$135
9/8/2009	0.4	Read through documents and emails for background of case.	SCB	\$225	\$90
9/11/2009	0.6	Further review of filed court documents and emails	SCB	\$225	\$135
9/14/2009	0.3	Emails with a Class member.	JWD	\$225	\$68
9/15/2009	0.8	Researched online complaints of former IJL clients	SCB	\$225	\$180
9/15/2009	0.5	Reviewing motions to dismiss briefs before case meeting with JGB	AM	\$270	\$135
9/15/2009	4.4	Reviewed Summary Doc. and Ct Filed Complaints	KMD	\$195	\$858

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/16/2009	2.9	Review all engagement letters; review discovery situation and service issues; review and update summary document	JGB	\$690	\$2,001
9/16/2009	5.8	Researched IJL complaints on blogs and consumer affairs websites	KMD	\$195	\$1,131
9/21/2009	0.3	Discussion with JGB and AM about next steps moving forward	SCB	\$225	\$68
9/23/2009	0.2	General meeting with JGB.	CSL	\$620	\$124
9/23/2009	0.3	Call and email to Class member.	JWD	\$225	\$68
9/23/2009	0.1	Spoke with AM about going forward with IJL	SCB	\$225	\$23
9/29/2009	0.9	Updated plaintiffs contact info in Excel	KMD	\$195	\$176
9/29/2009	0.6	Review service issues; many back and forth e-mails to and from SCB and case team re: service	JGB	\$690	\$414
9/29/2009	0.7	Email to SCB. Discussion with SCB. Email to Class member. Emails to JGB re: service on IJL franchises.	JWD	\$225	\$158
9/29/2009	0.3	Reviewing class cert template, figuring out how to put one together	AM	\$270	\$81
9/29/2009	0.5	Reviewing IJL case file materials (interview memos, etc)	AM	\$270	\$135
9/29/2009	0.2	Editing IJL e-mail for class members to come in for meetings	AM	\$270	\$54
9/30/2009	0.2	E-mails to and from AM re: class cert; review earlier class cert status	JGB	\$690	\$138
9/30/2009	1.9	Perform monthly tune-up	SCB	\$225	\$428
10/1/2009	0.2	Reading email from JGB. Discussion with AM.	JWD	\$225	\$45
10/1/2009	0.1	Case Update Mtg with JGB and SCB	AM	\$270	\$27
10/1/2009	2	Working on IJL Class Cert Document	AM	\$270	\$540

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/1/2009	1.6	sorting through IJL contact information emails; short meeting with JGB, AM, and MML	SCB	\$225	\$360
10/2/2009	0.9	Communicated with Plaintiffs re: scheduling dates for meetings/ edited contact information in PA as I received emails from Plaintiffs.	SCB	\$225	\$203
10/5/2009	1.2	Finishing draft of class cert	AM	\$270	\$324
10/5/2009	0.1	E-mail back and forth with AM re: class cert brief	JGB	\$690	\$69
10/5/2009	0.6	Email correspondence with IJL plaintiffs re: scheduling dates to meet.	SCB	\$225	\$135
10/6/2009	0.2	Reviewing template for request to admit for IJL,	AM	\$270	\$54
10/6/2009	0.1	Email correspondence with IJL Plaintiffs and AM.	SCB	\$225	\$23
10/7/2009	0.1	Scheduled meeting with Janet Klein.	SCB	\$225	\$23
10/7/2009	0.3	Back and forth e-mails with case team re: client meetings; review client memo	JGB	\$690	\$207
10/8/2009	0.1	Corresponded with AM and JGB re: meeting date with Janet Klein	SCB	\$225	\$23
10/9/2009	0.8	Reviewing IJL, old interview memos, and searching for template of Request for Admit	AM	\$270	\$216
10/9/2009	0.6	Reviewed previous interview memos made for class members early on in the investigation in order to prep for meetings beginning 10/20.	SCB	\$225	\$135
10/13/2009	0.5	Drafted stipulation order for IJL Franchises and sent off to Opposing Counsel.	AM	\$270	\$135
10/13/2009	0.3	Meeting with JGB, JWD, SCB re: IJL next steps, stipulation order, motion to compel.	AM	\$270	\$81
10/13/2009	0.4	Looking through docket sheet. Discussion with SCB, JGB, and AM re: moving forward in the case. Discussion with AM re: stipulation.	JWD	\$225	\$90

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/13/2009	0.3	Meeting with JGB, JWD, and AM re: moving IJL case forward, possible stipulation with Opposing counsel re: having Defense's motion to dismiss cover franchises along with main company.	SCB	\$225	\$68
10/15/2009	0.3	Email correspondence with KMD and AM re: interview preparation; emailed Janet Klein a reminder of the 10/20 meeting.	SCB	\$225	\$68
10/16/2009	0.4	Retrieved documents for IJL interview on Monday.	KMD	\$195	\$78
10/16/2009	0.2	Corresponded with Janet Klein re: meeting on 10/20.	SCB	\$225	\$45
10/18/2009	0.7	Edit class action motion brief.	JGB	\$690	\$483
10/19/2009	0.1	Reviewed IJL edits to class cert	AM	\$270	\$27
10/19/2009	1.1	Meeting with SCB and KMD re: IJL interview tomorrow and follow-up drafting of questions to ask	AM	\$270	\$297
10/19/2009	0.6	Starting to revise Cash4Gold Class Cert	AM	\$270	\$162
10/19/2009	0.3	Looked over last year's interview doc for IJL.	KMD	\$195	\$59
10/19/2009	0.8	Met with AM, SCB to prep for meeting tomorrow.	KMD	\$195	\$156
10/19/2009	0.8	Met with KD and AM to discuss preparation for meeting with Janet Klein.	SCB	\$225	\$180
10/19/2009	1.1	Review e-mails; touch base with JWD re: stip and letter to court; discuss with case team; review and edit letters.	JGB	\$690	\$759
10/19/2009	2.1	Drafting letters to the Court re: stipulation and class certification. Discussion with JGB. Sending letter to the Court. Sending copy of letter to opposing counsel.	JWD	\$225	\$473
10/20/2009	1.1	Met with SCB, AM, and class member Janet Klein	KMD	\$195	\$215
10/20/2009	2.5	Revising and incorporating edits to IJL Class Cert	AM	\$270	\$675

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/20/2009	0.6	Meeting with Class Member Janet Klein	AM	\$270	\$162
10/20/2009	3.9	Prepped for meeting with Janet Klein; AM, KD, and AM met with Janet Klein; read the documents she gave to us including her Contract with IJL and her notes on her experience; contacted via email potential plaintiff; spoke to potential plaintiff on phone to learn of her experience; emails with JGB and AM re: how plaintiffs should go about continuing relationship with IJL, although engaged in the suit.	SCB	\$225	\$878
10/21/2009	3.2	Corresponded via email with JGB and AM re: how plaintiffs should deal with IJL; emailed Janet Klein and Stacy Kincaid about contact with IJL; updated contacts for IJL; created engagement letter for Stacy Kincaid; emailed engagement letter to Stacy Kincaid; started working on Janet Klein interview memo; added staff members to ECF IJL updates; uploaded signed stip to PA.	SCB	\$225	\$720
10/21/2009	0.2	Mtg with JGB, SCB, JWD re: IJL next steps	AM	\$270	\$54
10/21/2009	2.2	Finishing editing and shortening IJL Class Cert to limit of 25 pages	AM	\$270	\$594
10/21/2009	0.5	Reviewing old interview memos, notes from interview with Janet Klein yesterday	AM	\$270	\$135
10/21/2009	0.1	Writing email for JGB	ASD	\$225	\$23
10/21/2009	0.4	Meeting with case team on how to proceed. Discussion with SCB re: stipulation.	JWD	\$225	\$90
10/22/2009	0.6	Review of emails.	CSL	\$620	\$372
10/22/2009	0.5	Reviewing SCB's interview memo, adding my own notes	AM	\$270	\$135
10/22/2009	0.2	Reviewed Stipulation of Franchises	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/22/2009	3.2	Engaged Stacy Kincaid and filed engagement letter; finished Janet Klein interview memo; emailed with named-plaintiffs to check in and ask if they had been contacted by IJL at any point.	SCB	\$225	\$720
10/23/2009	0.7	Email correspondence with IJL lead plaintiffs re: updates and contact with current contact with IJL, if any.	SCB	\$225	\$158
10/25/2009	0.1	Went through email responses from IJL lead plaintiffs and responded when necessary.	SCB	\$225	\$23
10/26/2009	0.2	Reminder email sent to Lisa Bruno re: 10/27 meeting; reminder emails sent to KMD and AM.	SCB	\$225	\$45
10/27/2009	0.4	Meeting on case.	CSL	\$620	\$248
10/27/2009	3.1	Spoke with KMD re: contact of NY/NJ plaintiffs to bring them in for meetings; interviewed Lisa Bruno with KMD and AM; emailed with Lisa Bruno earlier in day regarding the meeting; read through old 2007 IJL emails.	SCB	\$225	\$698
10/27/2009	0.2	Reviewed list of plaintiffs to reach out to re: meeting	KMD	\$195	\$39
10/27/2009	0.8	Meeting with client	KMD	\$195	\$156
10/27/2009	1.2	Reviewing and typing up Lisa Bruno e-mails and documents re: interview	AM	\$270	\$324
10/27/2009	0.2	Quick review of questions for interview with Lisa Bruno	AM	\$270	\$54
10/27/2009	0.6	Interview Meeting with Lisa Bruno, a named plaintiff in IJL	AM	\$270	\$162
10/28/2009	0.9	Contacted plaintiffs re: meeting	KMD	\$195	\$176
10/28/2009	2	Drafting affidavits of named plaintiffs for Class Cert	AM	\$270	\$540
10/28/2009	2	Reviewing interview memos, e-mails, documents for affidavits of named plaintiffs	AM	\$270	\$540

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/28/2009	2.3	Emailed Lisa Bruno; spoke with KMD re: contact of NY/NJ plaintiffs; emailed and spoke with AM re: affidavits; reformatted second amended complaint in order to send it via email; sent amended complaint to Kelley Tuthill; started interview memorandum for Lisa Bruno.	SCB	\$225	\$518
10/29/2009	1.5	Finishing up affidavits for plaintiffs in IJL class cert	AM	\$270	\$405
10/29/2009	2.6	Updated contact information for plaintiffs in PA; reviewed second amended complaint for named-plaintiff details; read over named-plaintiffs affidavits to determine missing details; drafted monthly tune-up emails for class members.	SCB	\$225	\$585
10/30/2009	1.7	Performed monthly tune-up; emailed potential plaintiff to coordinate a time to call and discuss the matter; spoke to Brad Berkowitz on the phone.	SCB	\$225	\$383
11/1/2009	0.2	Read through Lisa Bruno's contract; emailed Lisa Bruno.	SCB	\$225	\$45
11/2/2009	0.6	Discuss next steps with case team, including class cert, motion for costs, letter to court, and continuing investigation	JGB	\$690	\$414
11/2/2009	3.8	Meeting with JGB, AM, KMD, JWD to discuss next steps; emailed all named-plaintiffs re: affidavits; reviewed affidavits and searched through all documents for details of experiences from each named-plaintiff; spoke to potential plaintiff; created Bruno interview memo; PA saved Bruno contract.	SCB	\$225	\$855
11/2/2009	0.2	It's Just Lunch Case Meeting with JGB, SCB, JWD, KMD on next steps	AM	\$270	\$54
11/2/2009	0.2	Met with SCB, JWS, AM, JGB re: next steps	KMD	\$195	\$39
11/2/2009	0.7	Reviewing Woolf's letters to IJL and incorporated info about his criteria into his affidavit	AM	\$270	\$189

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/3/2009	0.7	Reviewing SRG's edits to affidavits of named plaintiffs, added more edits, and sent to SRG to convert to PDF form and send out for signature/notary	AM	\$270	\$189
11/3/2009	0.6	Began spreadsheet tracking enagement letters	KMD	\$195	\$117
11/3/2009	0.2	Talked to SCB re: affidavits and e-mail exchange re: specificity of affidavits	AM	\$270	\$54
11/3/2009	0.4	Looked at affidavits, e-mailed JGB and SCB re: specificity of affidavits of named plaintiffs	AM	\$270	\$108
11/3/2009	0.2	Review plaintiff affidavit; e-mail case team re: affidavits	JGB	\$690	\$138
11/4/2009	1.1	Updated spreadsheet tracking engagement letters	KMD	\$195	\$215
11/4/2009	2.2	Sorted through affidavits returned by named-plaintiffs; emailed with and spoke to on the phone Andy Woolf re: affidavit; spoke to Rodriguez re: affidavit; emailed with Bruno re: affidavit; spoke to MJN about creating a question template for all IJL plaintiffs.	SCB	\$225	\$495
11/5/2009	1.9	Went over IJL named-plaintiff affidavits to edit those that needed editing; saved received and signed affidavits into PA; searched Z/Matters for signed engagement letters; filed signed affidavit and letters.	SCB	\$225	\$428
11/6/2009	4.1	Searched Z drive for engagement letters; went through all emails and faxes in IJL folder for engagement letters; searched through hard-copy folders for engagement letters; drafted new engagement letters for named-plaintiffs; called Tortora; spoke to Salguero re: letter; saved Salguero's signed engagement letter; emailed Christine Huhn questions re: IJL experience; called and emailed Joann Costanzo re: time to discuss; spoke to JGB and emailed JGB and CSL to discuss next steps with engagement letters.	SCB	\$225	\$923

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/6/2009	0.3	Met with SCB re: missing engagement letters	KMD	\$195	\$59
11/6/2009	0.7	Searched Thunderbird folders for engagement letters	KMD	\$195	\$137
11/9/2009	0.4	Met with AM, JWD, JGB, SCB re: next steps.	KMD	\$195	\$78
11/9/2009	0.3	Case mtg with JGB, SCB, JWD, KMD re: IJL next steps	AM	\$270	\$81
11/9/2009	0.6	Review class cert brief; discuss plaintiff and organization issues with case team.	JGB	\$690	\$414
11/9/2009	3.6	Met with case team to discuss next steps and Tortora; created PDF versions of engagement letters for named-plaintiffs; sent engagement letters to named-plaintiffs; communicated via email with named-plaintiffs; spoke to Joann Costanzo on the phone; updated contacts in PA; wrote letter to Jim Tortora; spoke with JGB about letter to Tortora; started memo re: why it is a good idea to voluntarily dismiss Tortora; started to organize PA.	SCB	\$225	\$810
11/10/2009	0.2	Discuss with SCB plaintiff contact and lead plaintiff issues; review lead plaintiff info	JGB	\$690	\$138
11/10/2009	2.9	Created memo re: voluntary dismissal of James Tortora; spoke to JGB re: Andy Woolf request; emailed Karen Malak; updated plaintiff detail spreadsheet.	SCB	\$225	\$653
11/10/2009	0.4	Discussion with SCB re: letter to client. Editing letter to client.	JWD	\$225	\$90
11/11/2009	2.1	Started reviewing what PA documents needed to be resaved and recoded.	SCB	\$225	\$473
11/12/2009	6.8	Searched for the 140+ documents that had question marks in PA in the Z/_Matters folder and resaved each document with the appropriate date, name, coding, etc.; deleted all of the file names that did not have documents attached.	SCB	\$225	\$1,530

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/13/2009	0.2	Looked at IJL Class Cert edits to incorporate	AM	\$270	\$54
11/13/2009	0.4	Emailed IJL named-plaintiffs who have not returned signed affidavits.	SCB	\$225	\$90
11/14/2009	0.1	E-mail to case team re: sit down following week	JGB	\$690	\$69
11/15/2009	0.2	Made small edits to summary document; printed out copies of sum doc in preparation for meeting with case team on Monday.	SCB	\$225	\$45
11/16/2009	0.4	Met with SCB, JWD, AM, JGB re: next steps	KMD	\$195	\$78
11/16/2009	2.2	Edited IJL Class Cert, incorporated JGB's edits, made sure links were still working and exhibits updated	AM	\$270	\$594
11/16/2009	0.6	Discussion with SCB and DWW re: class period, statute of limitation and choice of law. Discussion with SCB re: firm biography for class certification.	SS	\$225	\$135
11/16/2009	0.3	Mtg with JGB, SCB, JWD, KMD re: IJL next steps	AM	\$270	\$81
11/16/2009	0.6	Have sit down reviewing all issues and next steps with case team	JGB	\$690	\$414
11/16/2009	0.4	Discussions with SCB. Meeting with case team.	JWD	\$225	\$90
11/16/2009	4.7	Met with case team to discuss next steps and housekeeping; researched statutes of limitations of claims for relief on Westlaw to determine the time period of the class covered by the complaint and class certification; drafted JGB affidavit for motion for class cert; drafted new Class Action matters list; emailed and spoke with AM re: class certification brief; emailed Andy Woolf in response to his call.	SCB	\$225	\$1,058
11/17/2009	0.2	E-mails to and from case team re: necessary elements in motion for costs	JGB	\$690	\$138
11/17/2009	0.2	Reviewing IJL affidavits for Class Cert	AM	\$270	\$54

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/17/2009	3.1	Added to and enhanced the firm biography; edited the class action matters list; researched moving for costs in FRCP; discussed with JWD.	SCB	\$225	\$698
11/17/2009	0.4	Discussions with SCB re: moving for costs.	JWD	\$225	\$90
11/18/2009	4.9	Researched previous document demands; reviewed court filed documents re: discovery stay and initiation; added to document demands, interrogatories, and requests to admit; emailed Joann Costanzo; called Sandra Burga.	SCB	\$225	\$1,103
11/18/2009	0.2	Reviewed and edited SCB's version of JGB's Affidavit to Class Cert	AM	\$270	\$54
11/19/2009	4.2	Reread complaint in order to better prepare the discovery demands; emailed named-plaintiffs re: affidavit; redid discovery demands and sent to AM for review.	SCB	\$225	\$945
11/19/2009	0.1	Made further revision to IJL Class Cert re: wording of dates	AM	\$270	\$27
11/19/2009	0.3	Discussion with SCB.	JWD	\$225	\$68
11/20/2009	0.4	Review client e-mail; discuss next steps with SCB; review PA tasks	JGB	\$690	\$276
11/20/2009	0.4	Discussion with SCB re: motion for costs.	JWD	\$225	\$90
11/20/2009	5.8	Met with JGB to discuss IJL's contact of Woolf and class certification affidavits; implemented AM's edits to the discovery documents; wrote the motion for costs and emailed to AM for review.	SCB	\$225	\$1,305
11/22/2009	0.9	Edited motion for costs.	SCB	\$225	\$203
11/23/2009	1.8	Called Sandra Burga and Karen McBride re: affidavits; spoke to Heather Wexler re: her experience with IJL and her recent contact with IJL; edited the motion for costs and fees for service; emailed McBride.	SCB	\$225	\$405

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/23/2009	0.7	Reviewing IJL Motion for Costs, sent to SCB for revisions, etc.	AM	\$270	\$189
11/24/2009	0.3	E-mails to and from team re: class cert issues	JGB	\$690	\$207
11/24/2009	0.4	Reviewed/incorporated changes in IJL Motion for Costs	AM	\$270	\$108
11/24/2009	5.1	Researched cases and added authority column in the summary document; edited motion for costs; emailed update to IJL case team; discussed with JWD status of Andy Woolf as named-plaintiff; emailed Sandra Burga.	SCB	\$225	\$1,148
11/28/2009	3.8	Review and edit class cert brief, declaration, motion for costs, proposed correspondence, and summary document; e-mails to and from of counsel and case team	JGB	\$690	\$2,622
11/30/2009	0.3	Checked online to see what is the rule regarding California plaintiffs in IJL case (whether they can still be part of action even if California claims are dismissed)	AM	\$270	\$81
11/30/2009	2.1	Revising and incorporating JGB's changes into IJL Class Cert	AM	\$270	\$567
11/30/2009	0.3	Talked to SCB re: Woolf and Tantora being removed from action	AM	\$270	\$81
11/30/2009	4.3	Case tune-up; Email to McBride re: affidavit; Westlaw research for Tortora memo on withdrawing named-plaintiffs; edited Tortora memo; spoke to AM re: Woolf status; edited motion for costs; read through emails from plaintiffs in response to monthly update email.	SCB	\$225	\$968
12/1/2009	1.7	Review update e-mails to clients; back and forth e-mails re: withdrawal, class cert, costs, and other issues.	JGB	\$690	\$1,173
12/1/2009	0.3	Reading through emails from SCB and JGB. Discussion with SCB re: Andrew Woolf.	JWD	\$225	\$68

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/1/2009	0.3	Talked to SCB re: edits in Class Cert and made further changes.	AM	\$270	\$81
12/1/2009	3.9	Emailed clients responses to their inquiries about IJL contact; phone call with Aracely Salguero; discussion with other analysts; email correspondence with JGB re: Salguero question; emailed Sandra Burga; searched for case law for motion for costs; emailed AM info found.	SCB	\$225	\$878
12/2/2009	0.8	Discuss motion for class cert, motion for costs, motion to withdraw, letters to court, plaintiff status, and general case meeting with JWD, SCB, and AM; review earlier letters	JGB	\$690	\$552
12/2/2009	0.4	Meeting with case team. Discussion with SCB.	JWD	\$225	\$90
12/2/2009	2.6	Edited summary document; met with case team to discuss next steps; emailed with McBride re: affidavit; reviewed motion for costs; reviewed steps to create notice of motion to withdrawal for Tortora.	SCB	\$225	\$585
12/2/2009	0.7	Reviewed our opposition to the motion to dismiss in IJL, relating to footnote dismissing Woolf's claims, and searched online if he was precluded entirely from common law claims	AM	\$270	\$189
12/3/2009	0.8	Revised SCB's letter to Court re: Tortora withdrawal	AM	\$270	\$216
12/3/2009	2.9	Edited motion for costs; drafted letter to court re: Tortora; called court to determine proper means of withdrawing plaintiff; email correspondence with case team; saved McBride's affidavit in PA.	SCB	\$225	\$653
12/3/2009	1.2	Worked on SCB's draft of the letter to Judge Stein re Tortora, looked up and reviewed caselaw SCB cited	AM	\$270	\$324
12/3/2009	1.4	Review and edit all documents for filing; e-mails to and from case team	JGB	\$690	\$966

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/3/2009	0.2	Discussed with SCB procedures to file notice of withdrawal, time logged for work on motion for costs.	AM	\$270	\$54
12/3/2009	1.6	Editing letter to Court. Discussion with SCB. Emails with JGB.	JWD	\$225	\$360
12/4/2009	0.8	Reviewing and editing IJL Class Cert to name two lead plaintiffs	AM	\$270	\$216
12/7/2009	0.8	Revising IJL Motion for Costs, adding prelim statement	AM	\$270	\$216
12/7/2009	3.9	Edited discovery documents; met with case team to discuss next steps; emailed with JGB re: motion for costs and affidavit; emailed Burga; made edits to motion for costs and affidavit for JGB's review.	SCB	\$225	\$878
12/7/2009	1.1	Discussion with JGB. Putting together new drafts of letters to the Court. Discussion with SCB.	JWD	\$225	\$248
12/7/2009	2.3	Review and edit motion for costs, motion to dismiss, and two letters to court; review next steps in matter; e-mail to case team	JGB	\$690	\$1,587
12/8/2009	5.8	Made final edits to motion for costs and motion for class certification; created notices of motions for both motions; emailed with JGB to discuss return dates; emailed with AM re: motion for class cert edits; created declarations of exhibits for both motions; reviewed Individual practice rules and local rules for SDNY to determine return dates for both motions; emailed Bari Klein re: stipulation for briefing schedule of motions; met with case team to discuss when to file.	SCB	\$225	\$1,305
12/8/2009	0.8	Touch base with case team re: next steps with motions; review motions	JGB	\$690	\$552
12/8/2009	0.4	Scanning JGB's edits and sending them to SCB via email. Reviewing letter to opposing counsel and discussion with SCB re: return dates.	SS	\$225	\$90

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/8/2009	0.8	Helping SCB with table of authorities for motion. Putting in final edits for letters to the Court. Meeting with case team re: filing motions.	JWD	\$225	\$180
12/8/2009	0.6	Reading emails from JGB. Editing letters to the Court re: motions being filed.	JWD	\$225	\$135
12/8/2009	1.8	Reviewing, editing Class Cert, incorporating JGB's changes so we can file	AM	\$270	\$486
12/9/2009	4.3	Edited summary document; implemented edits from JWD on motion for class certification; created document detailing legal fee breakdown for motion for costs; edited notices of motions with return dates; changed dates on all documents to be filed for motion to 12/21/09 in preparation for filing; created motion filing checklist.	SCB	\$225	\$968
12/9/2009	0.1	Spoke with JGB re: IJL filing of motion for costs, class cert	AM	\$270	\$27
12/9/2009	1.2	Discussion with SCB. Reading through and editing motion for class certification.	JWD	\$225	\$270
12/10/2009	1.6	Reviewed documents picked up from JLN.	SCB	\$225	\$360
12/11/2009	2.2	Listen to voicemail from lawyer; review lawyer's background; review documents to be filed; e-mail case team	JGB	\$690	\$1,518
12/11/2009	0.3	Email exchange with JGB re: voice mail from California Lawyer. Call to California Lawyer.	SS	\$225	\$68
12/13/2009	0.2	Discussion with JGB re: filing; email to Burga.	SCB	\$225	\$45
12/14/2009	0.4	Discussion with SRG re: return date and filing motions via ECF.	SS	\$225	\$90
12/14/2009	4.3	Prepped all documents for filing; filed documents with the court; filed letter with the SDNY; emailed with potential client.	SCB	\$0	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/14/2009	0.8	Review and draft e-mail response to D/C; touch base with all staff re: filing motions	JGB	\$690	\$552
12/15/2009	1.3	Searching for legal authority on discovery stay and dispositive motions not precluding class cert	AM	\$270	\$351
12/15/2009	0.2	Mtg with JGB, JWD, SCB on responding to defense counsel's letter re: class cert and mtn for costs	AM	\$270	\$54
12/15/2009	2.1	Review defense counsel letter; discuss response and next steps with case team; touch base on ECF issues; review and edit letter to court	JGB	\$690	\$1,449
12/15/2009	0.4	Reviewed Motion for Costs and Fees for Service Pursuant to Federal Rule 4(d).	JLN	\$520	\$208
12/15/2009	0.2	Reviewed Memorandum Of Law in Support for Motion Costs and Fees for Service Pursuant to Federal Rule 4(d)	JLN	\$520	\$104
12/15/2009	0.1	Reviewed Declaration of John G. Balestriere in Support of Motion Costs and Fees for Service Pursuant to Federal Rule 4(d).	JLN	\$520	\$52
12/15/2009	0.1	Reviewed Motion to Certify Class	JLN	\$520	\$52
12/15/2009	0.1	Reviewed Memorandum of Law in Support of Motion to Certify Class	JLN	\$520	\$52
12/15/2009	0.4	Reviewed Declaration of John G. Balestriere in Support of Motion to Certify Class	JLN	\$520	\$208
12/15/2009	1.2	Meeting with case team on case. Discussion with SCB. Working on letter to Court.	JWD	\$225	\$270
12/15/2009	4.4	Wrote letter to court; searched for authority for letter; refiled both motions; spoke with JGB.	SCB	\$225	\$990
12/16/2009	0.8	Reviewing IJL summary document, updating accordingly	AM	\$270	\$216
12/16/2009	0.2	Emailed with potential client.	SCB	\$225	\$45

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/17/2009	0.6	E-mails to and from defense counsel re: dates for class cert litigation; e-mails to and from case team re: stipulation; review stipulation	JGB	\$690	\$414
12/17/2009	1.1	Table of pleading in summary doc, reviewed complaint and documents for still viable claims	AM	\$270	\$297
12/17/2009	2.6	Created dossiers on all named-plaintiffs; spoke to potential plaintiff; created engagement letter for potential plaintiff and emailed it to her.	SCB	\$225	\$585
12/17/2009	1.1	Emails with case team. Drafting stipulation and sending to opposing counsel.	JWD	\$225	\$248
12/18/2009	0.3	Review scheduling issues; review proposed letter to court	JGB	\$690	\$207
12/18/2009	0.9	Worked on IJL summary document.	SCB	\$225	\$203
12/20/2009	0.6	Putting together letter to Court re: motion schedule.	JWD	\$225	\$135
12/21/2009	1.4	Editing letter to Court re: motion schedule. Putting together proposed scheduling order. Submitting letter to Court and faxing copy to opposing counsel.	JWD	\$225	\$315
12/21/2009	1.6	Phone calls with Cindy Galter; added phone noted from last week's phone call with Galter; discussed with other analysts the engagement letter; reviewed what engagement letters we do have from plaintiffs.	SCB	\$225	\$360
12/21/2009	0.2	Review and edit letter to court re: scheduling; discuss with JWD	JGB	\$690	\$138
12/22/2009	1.1	Emailed Norinsberg re: scanning status; drafted case tune-up email; reviewed hours; made phone note for 12/21 Galter phone calls; emailed Burga re: class affidavit.	SCB	\$225	\$248

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/23/2009	1.6	Case tune-up; emailed various plaintiffs' re: their responses to my update email; called Salguero; reviewed court filings; met with case team to discuss next steps; spoke with JWD re: letter to the court; added motion for costs deadlines to PA.	SCB	\$225	\$360
12/23/2009	0.1	Mtg with JGB, JWD, and SCB re: Judge Fox's stay of class cert mtn	AM	\$270	\$27
12/23/2009	0.4	Emails with JGB re: availability. Saving and reading through Judge's orders, and emails with JGB re: orders.	JWD	\$225	\$90
12/23/2009	0.1	Reviewed Order re: scheduling for Motion Costs and Fees for Service Pursuant to Federal Rule 4(d)	JLN	\$520	\$52
12/23/2009	0.1	Reviewed Order deferring ruling/staying Motion to Certify Class, pending resolution of the defendants' motion to dismiss the second amended complaint	JLN	\$520	\$52
12/24/2009	0.1	Left message for Aracely Salguero	SCB	\$225	\$23
1/4/2010	0.1	Discuss case at case meeting.	JWD	\$225	\$23
1/4/2010	4.8	Compared BL IJL documents to JLN documents to ensure we had copies; scanned multiple JLN documents for our records; emailed Kari Edwards; had document rebound; emailed JLN re: when to drop of documents.	SCB	\$225	\$1,080
1/5/2010	2.6	Emailed back and forth with Crockett (Pot. Plaintiff) re: status of case and how to get involved; created engagement letter and sent it to Crockett; scheduled phone call with Edwards; dropped off JLN documents; emailed Burga re: affidavit received; updated summary document.	SCB	\$225	\$585
1/6/2010	0.6	Prepped for case sit-down.	SCB	\$225	\$135
1/7/2010	0.9	Emailed Crockett re: status of engagement letter; spoke with Kari Edwards re: her IJL experience; created phone note for call.	SCB	\$225	\$203

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/8/2010	0.7	Emailed class members re: name change; emailed with Burga re: affidavit; emailed with Andy Woolf re: status of case; updated case diary.	SCB	\$225	\$158
1/10/2010	0.1	Emailed opposing counsel re: name change.	SCB	\$225	\$23
1/11/2010	4.3	Reviewed all engagement letters and saved in PA and in matters folder to determine who had actually signed and returned them; searched for damages of thirteen Class Members in our records; created engagement letters for Costanzo, Dandar, Elliot, Fiscella, Griffen, Waldick, Yu and Cassidy; emailed Kaplan, Parmley, Snyder, Wexler, Carr, Yu and Waldick re: specific damages; emailed back and forth with Yu and Waldick; emailed MJN to review engagement letters.	SCB	\$225	\$968
1/12/2010	0.8	Prepared engagement letters to be sent; emailed Snyder re: documents and damages; emailed six different Class Members their engagement letters; corresponded with two Class Members via email.	SCB	\$225	\$180
1/13/2010	0.9	Emailed Yu re: her engagement letter; created Notice of Appearance and change in firm name; ECFed said notice; reviewed engagement letters sent and updated engagement letter spreadsheet.	SCB	\$225	\$203
1/14/2010	1.5	Review letter from defense counsel; discuss next steps; review draft of letter; review court's order; review all next steps with of counsel	JGB	\$690	\$1,035
1/14/2010	1	Review all next steps with of counsel	VMF	\$390	\$390
1/14/2010	0.3	Line editing letter to Court for SCB.	JWD	\$225	\$68

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/14/2010	2.6	Received fax from Klein re: letter to court requesting permission to cross-move against us; spoke to JGB re: our response; drafted, edited, and filed a response letter to the court; read through Fox's order denying Ds' request and saved it in PA; updated case diary.	SCB	\$225	\$585
1/15/2010	0.8	Review earlier filings; discuss case status with of counsel	JGB	\$690	\$552
1/15/2010	0.4	Emailed with JGB re: due date for draft; reviewed emails sent to plaintiffs with engagement letters to determine who has not responded.	SCB	\$225	\$90
1/19/2010	0.4	Discuss motion for summary judgment with SCB; review voicemails from attorney	JGB	\$690	\$276
1/19/2010	3.3	Put in phone notes for JGB from Ray Gallo; reviewed C. Waldick engagement letter and saved in PA; emailed C. Waldick; reviewed court filings and Assurances of Discontinuance to prep for MSJ draft; began to draft MSJ.	SCB	\$225	\$743
1/20/2010	0.1	Back and forth e-mails with SCB re: motion	JGB	\$690	\$69
1/20/2010	2.3	Continued working on MSJ draft; did legal research for summary judgment elements to incorporate in MSJ; read through Ds' Opposition to the motion for costs; emailed with case team re: opposition.	SCB	\$225	\$518
1/21/2010	0.3	Reviewed SCB's motion memo and summary doc for timeline details re: facts in application for attorney's fees.	AM	\$270	\$81
1/21/2010	0.6	Reviewed first Memorandum of Law in Opposition to Motion Costs and Fees for Service Pursuant to Federal Rule 4(d).	JLN	\$520	\$312
1/21/2010	0.3	Reviewed declaration of Bari Klein in Opposition to Motion Costs and Fees for Service Pursuant to Federal Rule 4(d).	JLN	\$520	\$156

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/21/2010	4.9	Researched via Westlaw for MSJ; drafted MSJ; read through Motion for Costs Opposition again; created motion memo; spoke to AM and JGB re: Reply.	SCB	\$225	\$1,103
1/22/2010	3.8	Reviewed initial application for attorney's fees, defense's opposition and cited caselaw, drafting of reply to defense's opposition, researching caselaw to support argument, and asked SCB to draft affidavits for her and myself and to get more detailed work hour logs.	AM	\$270	\$1,026
1/22/2010	0.3	Emailed with Snyder and Kaplan re: engagement letters; spoke briefly with AM re: documents needed for Reply.	SCB	\$225	\$68
1/23/2010	0.2	Read through IJL Google alert article that mentioned Brad Berkowitz.	SCB	\$225	\$45
1/24/2010	0.9	Review and edit motion for partial summary judgment	JGB	\$690	\$621
1/24/2010	0.2	Review voicemail from lawyer; review earlier voicemails from lawyer; e-mail SCB re: follow up	JGB	\$690	\$138
1/24/2010	0.2	Read through email from JGB and responded.	SCB	\$225	\$45
1/25/2010	1.8	Finished draft of Reply for IJL motion for costs, added caselaw support.	AM	\$270	\$486
1/25/2010	2.9	Created engagement letters and set them to Snyder and Kaplan; updated engagement letter status spreadsheet; called Ray Gallo and made phone note; created exhibits (detailed timesheets and affidavits for AM, SCB, and JWD) for motion for costs reply; edited motion for costs reply.	SCB	\$225	\$653
1/26/2010	0.2	Reviewed final draft of Reply to IJL Motion for Cost	AM	\$270	\$54
1/26/2010	0.1	Reviewed affidavits of AM, SCB, and JWD to attach to Reply Memo	AM	\$270	\$27

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/26/2010	0.9	Edit reply brief for costs for SCB.	DWW	\$225	\$203
1/26/2010	0.5	Discuss class cert, MSJ, scheduling, and possible California action issues with SCB; review earlier e-mails and voicemails from California lawyer	JGB	\$690	\$345
1/26/2010	2.9	Spoke to AM re: affidavits for Motion for Costs Reply; spoke to DWW re: edits to Reply; incorporated AM and DWW edits and gave to JGB to review; created declaration of JGB for Reply; edited Reply exhibits (affidavits, fee breakdown); spoke with JGB re: Gallo and moving forward with MSJ.	SCB	\$225	\$653
1/27/2010	0.4	Review case status; review final IJL reply; e-mails to and from SCB re: filing	JGB	\$690	\$276
1/27/2010	0.1	E-mailed SCB my reply brief work for the timesheet exhibit, revised the reply brief to reflect the new work hours totals.	AM	\$270	\$27
1/27/2010	4.6	Added JGB motion for costs reply edits; calculated time and fees created from reply brief work; added new information to the affidavits of AM and SCB, as well as the Legal Fees Breakdown Spreadsheet to reflect reply brief hours and fees; ECFed motion for costs reply brief; printed out courtesy copies of the fully-briefed motion for Judge Fox and prepared for delivery; emailed plaintiffs whose engagement letters I have not received; saved Mary-Susan Snyder's engagement letter and IJL info in PA.	SCB	\$225	\$1,035
1/27/2010	0.1	Reviewed Declaration of John G. Balestriere in Support of Motion Costs and Fees for Service Pursuant to Federal Rule 4(d)	JLN	\$520	\$52
1/27/2010	0.3	Reviewed Reply Memorandum of Law in Support of Motion Costs and Fees for Service Pursuant to Federal Rule 4(d)	JLN	\$520	\$156
1/29/2010	1.2	Case tune-up; emailed clients who responded to mass email; reviewed JGB MSJ edits.	SCB	\$225	\$270

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/4/2010	1.4	Worked on MSJ edits and gave to JGB.	SCB	\$225	\$315
2/8/2010	0.8	Review and edit motion for summary judgment; discuss with SCB	JGB	\$690	\$552
2/8/2010	0.1	Discussion with JGB re: MSJ edits.	SCB	\$225	\$23
2/9/2010	0.2	E-mail back and forth with analyst re: client contact	JGB	\$690	\$138
2/9/2010	3.4	Emailed and spoke with AM re: MSJ edits; worked on MSJ, Notice, and Rule 56.1 Statement; incorporated AM's edits; spoke to Class Member for over an hour about her experience; followed up with email.	SCB	\$225	\$765
2/9/2010	0.7	Reviewed IJL Summary Judgment Motion Draft, made tracked changes for SCB to incorporate.	AM	\$270	\$189
2/11/2010	0.4	Reviewed and updated summary document	AM	\$270	\$108
2/11/2010	1.6	Made more edits to MSJ; searched for page numbers of case cites in MSJ on Westlaw; reviewed email from plaintiff; emailed with AM re: summary document; sorted emails from inbox.	SCB	\$225	\$360
2/16/2010	1.3	Review and edit MSJ papers	JGB	\$690	\$897
2/16/2010	1.2	Reviewed caselaw forwarded by SCB, did Westlaw research on class periods, whether they can be extended to include people outside period, spoke to and e-mailed SCB with answer to questions re: potential class member.	AM	\$270	\$324
2/16/2010	1.8	Spoke to Irram Qadir, a potential plaintiff; emailed with AM re: eligibility of class members; researched on Westlaw eligibility of potential plaintiff who signed IJL contract outside of class period defined in the SAC; read through JGB email re: MSJ.	SCB	\$225	\$405
2/17/2010	0.4	Briefly spoke with JWD re: filing MSJ; reviewed JGB MSJ edits.	SCB	\$225	\$90

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/18/2010	0.7	Spoke with JWD re: MSJ filing; wrote email to JGB and case team re: thoughts on MSJ filing; reviewed Fox order on Klein's letter re: motions.	SCB	\$225	\$158
2/19/2010	0.9	Drafted letter to court re: motion for costs and MSJ; emailed with AM re: next event.	SCB	\$225	\$203
2/23/2010	0.6	Reviewed IJL ruling on MTD, talked to SCB about next step for summary judgment	AM	\$270	\$162
2/23/2010	1.3	Reviewed Report and Recommendation re: Motion to Dismiss 2nd Complaint; researched case law cited therein	JLN	\$520	\$676
2/23/2010	1.1	Reviewed Fox's Report and Recommendation; briefly spoke to JGB and AM separately; spoke to JWD and other analysts re: decision.	SCB	\$225	\$248
2/24/2010	2.8	Review court decision; research cited cases; discuss with case team; e-mail to liaison counsel	JGB	\$690	\$1,932
2/24/2010	0.2	Read through emails from JGB re: report and recommendation.	SCB	\$225	\$45
2/25/2010	0.6	Mtg with JGB, JWD, and SCB re: R & R, next steps	AM	\$270	\$162
2/25/2010	2.8	Edited MSJ; reviewed review and recommendation again; met with case team to discuss next steps; updated sum doc and case diary; monthly tune-up responsibilities in part.	SCB	\$225	\$630
2/25/2010	0.6	Meeting with case team to discuss order on motion to dismiss and moving the case forward.	JWD	\$225	\$135
2/26/2010	0.9	Case tune-up; reviewed report and recommendation; emailed with AM re: next steps.	SCB	\$225	\$203
2/28/2010	0.3	Review report and recommendation; e-mail to defense counsel; e-mail to SCB re: WYSS letter	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/1/2010	2.6	Reviewed IJL causes of actions, looking up statutes for the period of limitations, whether we can still file such claims in California; Meeting with JGB, SS, JWD, and JLN re: next steps post MTD.	AM	\$270	\$702
3/1/2010	2.6	Emailed AM re: SoLs; discussed with AM re: same; reviewed her email with SoL for CA claims; met with case team to discuss next steps; drafted WYSS letter to Klein for Rodriguez settlement; reviewed engagement letters to calculate number of engaged plaintiffs; reviewed invoice.	SCB	\$225	\$585
3/3/2010	0.6	Edited and filed motion to withdraw CSL as counsel; spoke to Irram Qadir about the status of her small claims action.	SCB	\$225	\$135
3/3/2010	0.1	Reviewed Motion for Craig Stuart Lanza to Withdraw as Attorney	JLN	\$520	\$52
3/4/2010	0.1	Read through emails between JGB and JLN.	SCB	\$225	\$23
3/8/2010	0.8	Spoke to JWD briefly about next steps with IJL Plaintiffs; skimmed over Fox's report and recommendation re: unjust enrichment; updated case diary and sum doc.	SCB	\$225	\$180
3/9/2010	0.6	Tried calling Kuykendall a couple of times; left VM for Kuykendall; emailed with JGB re: Kuykendall and next steps; emailed case team re: meeting the following day.	SCB	\$225	\$135
3/10/2010	1.6	Research on consolidating actions	AM	\$270	\$432
3/10/2010	0.4	Reviewing/editing updated version of partial MSJ on unjust enrichment.	AM	\$270	\$108
3/10/2010	1.4	Discussion with new potential client; follow up e-mails with SCB re: potential client; review earlier reports from Magistrate Judge	JGB	\$690	\$966
3/10/2010	0.2	Mtg with JGB, SCB, and JWD re: next steps in IJL	AM	\$270	\$54

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/10/2010	3.4	Spoke to Kuykendall; met with case team to discuss next steps; worked on MSJ; searched case law for MSJ; drafted WYSS letter for named-plaintiffs with unjust enrichment claims; emailed with case team; spoke to AM re: edits.	SCB	\$225	\$765
3/11/2010	1.2	Research on consolidation, factors and rule in California	AM	\$270	\$324
3/11/2010	0.1	Reviewed Order granting Motion to Withdraw	JLN	\$520	\$52
3/11/2010	0.7	Read through JLN IJL document re: people recently contacted; reviewed California claims to understand elements.	SCB	\$225	\$158
3/12/2010	1.5	Review Fox's Report and Recommendation and other IJL Case Materials	BJP	\$270	\$405
3/12/2010	0.3	Discuss Case with JGB	BJP	\$270	\$81
3/12/2010	0.7	Emailed with AM re: new complaint; reviewed order re: CSL withdrawal; case diary.	SCB	\$225	\$158
3/14/2010	0.7	Review proposed MSJ; e-mail to SCB re; next steps	JGB	\$690	\$483
3/15/2010	0.5	Review Draft of California Complaint	BJP	\$270	\$135
3/15/2010	0.3	Revising consolidation memo with JGB's edits	AM	\$270	\$81
3/15/2010	3.4	Researching SOL and California statutes, drafting Complaint to file in California federal court	AM	\$270	\$918
3/15/2010	0.2	Email JGB, Discuss Next Step with SCB	BJP	\$270	\$54
3/15/2010	3.1	Reviewed JGB email re: MSJ; reviewed JLN recent contacts; called Tricia Freire to discuss experience with IJL; made phone note; reviewed what AM has done for CA complaint; briefly spoke to BJP re: next steps; saved in PA order on CSL motion to withdraw.	SCB	\$225	\$698
3/16/2010	1.1	Review Confidential Informant Materials in PA	BJP	\$270	\$297

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/16/2010	0.1	Meet with SCB	BJP	\$270	\$27
3/16/2010	6.2	Sorting through all contact with any class members to compile a spreadsheet of all contact information and details of IJL experience.	SCB	\$225	\$1,395
3/17/2010	3.8	Went through IJL email folder and continued updating master spreadsheet; spoke to JGB re: contacting class members; spoke to and emailed BJP re: CDCA complaint; emailed class member.	SCB	\$225	\$855
3/17/2010	4.3	Review Case Information	BJP	\$270	\$1,161
3/18/2010	1.1	Review Case Information	BJP	\$270	\$297
3/18/2010	3.5	Review Case Information	BJP	\$270	\$945
3/19/2010	0.9	Review Case Information and Edit CA Complaint	BJP	\$270	\$243
3/19/2010	1.8	Phone call with Greg Forgie; created engagement letter for Forgie; emailed with BJP re: contact with former employee; emailed with JLN re; former employee; read through email chain with case team.	SCB	\$225	\$405
3/21/2010	0.1	Read through IJL email from Kim Kuykendall with questions about the engagement letter.	SCB	\$225	\$23
3/22/2010	0.9	E-mails to and from case team re: next steps; discuss with of counsel	JGB	\$690	\$621
3/22/2010	0.3	Meeting with SCB and Follow Up Email to JGB	BJP	\$270	\$81
3/22/2010	0.6	Reviewed documents sent by Greg Forgie; emailed with Kim Kuykendall re: engagement letter wording; spoke to BJP re: CDCA complaint; emailed with case team.	SCB	\$225	\$135
3/23/2010	1.7	Spoke to BJP re: IJL next steps; reviewed emails from BJP and JGB re: CDCA action; reviewed CDCA complaint.	SCB	\$225	\$383
3/23/2010	2.3	Review 9th Circuit and 2nd Circuit class cert decisions as relevant to the case	JGB	\$690	\$1,587

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/23/2010	0.3	Emails with former IJL Employee Wendy Nagle	BJP	\$270	\$81
3/25/2010	1.1	Emailed with Nicole from JLN's office re: notes from phone calls; emailed Kim Kuykendall re: engagement letter; read through recent IJL contact list from Nicole; updated Class Member spreadsheet with new contact information.	SCB	\$225	\$248
3/25/2010	0.4	Discuss with SCB new client; e-mails to and from new client	JGB	\$690	\$276
3/26/2010	0.2	Reply to Nagel's phone message	BJP	\$270	\$54
3/26/2010	0.1	Update weekly next step/event	BJP	\$270	\$27
3/26/2010	0.4	Create questions for call to Wendy Nagel	BJP	\$270	\$108
3/26/2010	0.1	Call to Wendy Nagel, no answer	BJP	\$270	\$27
3/26/2010	0.9	Attempted call to former employee with BJP; spoke to former client/class member; emailed her to schedule a phone call; updated case diary; emailed with Kim Kuykendall re: engagement issues.	SCB	\$225	\$203
3/30/2010	0.3	Review judge's order; e-mails to and from case members; discuss with case members next steps	JGB	\$690	\$207
3/30/2010	0.3	Reading through order on motion to dismiss. Discussion with SCB. Email from JGB.	JWD	\$225	\$68
3/30/2010	1.8	Read through order from Stein re: upheld fraudulent inducement claim; discussed with other analysts; emailed class member to set up phone call time; read through emails between case team re: court filing; attempted calling former employee again; reviewed billing for matter; updated contacts; sorted emails; emailed Tatiana re: EliteMeeting.com.	SCB	\$225	\$405

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/31/2010	2.8	Discuss with case team next steps; e-mail to co-counsel; review class cert decisions in Second Circuit on fraudulent inducement; devise plan of next steps; e-mail to defense counsel	JGB	\$690	\$1,932
3/31/2010	0.4	Review/edit motion for summary judgment	BJP	\$270	\$108
3/31/2010	0.2	Meeting with JWD/SCB/JGB on proceeding post-Stein's order	BJP	\$270	\$54
3/31/2010	1.1	Monthly tune-up; spoke with case team to discuss next steps; emailed with BJP re: MSJ.	SCB	\$225	\$248
3/31/2010	0.2	Email to Wendy Nagel; received phone call back	BJP	\$270	\$54
4/1/2010	0.2	Review and respond to defense counsel e-mail; review earlier order of Judge Stein	JGB	\$690	\$138
4/1/2010	1.5	Spoke to Jaki Baskow, a former IJL client; created engagement letter; spoke to BJP re: next steps for IJL; reviewed invoice; reviewed emails sent between JGB and O/C; sorted emails.	SCB	\$225	\$338
4/2/2010	0.8	Review letter from defense counsel; draft defense counsel letter; discuss next steps with case team	JGB	\$690	\$552
4/2/2010	2.6	Write memorandum on getting fraudulent inducement class certified	BJP	\$270	\$702
4/2/2010	4.1	Drafted post-filing letter; reviewed letter from O/C to the Court; spoke with JGB; drafted letter to the Court in response to O/C's letter; emailed update to all Class Members; emailed with various class members in response to my update; updated case diary.	SCB	\$225	\$923
4/2/2010	0.3	Meeting with case team.	JWD	\$225	\$68
4/5/2010	0.3	Review order; emails to and from case team re: next steps re: pleadings and scheduling.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/5/2010	3.9	Made edits to post-filing letter; emailed with JLN; sent post-filing letter to Klein; reviewed JLN's email re: MSJ; searched for letter written to Court re: Woolf as plaintiff; discussed with JWD; emailed case team re: Woolf; drafted email to Woolf and sent him response to his inquiry; emailed with potential plaintiff Julie Johnston; emailed Crockett with engagement letter.	SCB	\$225	\$878
4/5/2010	0.1	Scanned and emailed document to SCB.	SRG	\$225	\$23
4/5/2010	2.1	Work on motion for class certification	BJP	\$270	\$567
4/5/2010	0.1	Review post-filing letter to Klein	BJP	\$270	\$27
4/5/2010	0.3	Discussion with SCB re: letter to Court re: Woolf. Reading through email from SCB.	JWD	\$225	\$68
4/5/2010	0.1	Reviewed endorsed letter re: enlargement of time to respond	JLN	\$520	\$52
4/6/2010	2.6	Read through FRCP and local rules for how to withdraw a motion; reviewed other matter motion withdrawals for references; create notice of withdrawal for SDNY motion for class cert; emailed with BJP; reviewed Fox Order on motion for costs; updated procedures memo on waiving service; emailed Andy Woolf re: named-plaintiff status.	SCB	\$225	\$585
4/6/2010	4.8	Work on motion for class certification	BJP	\$270	\$1,296
4/6/2010	0.2	Reviewed Order: denying plaintiffs' motion for costs and fees, pursuant to Fed. R. Civ. P. 4(d)	JLN	\$520	\$104
4/7/2010	0.5	Edit interrogatories and document production requests	BJP	\$270	\$135
4/7/2010	0.4	Review letter requesting to withdraw motion for class cert. Research basis for doing so.	BJP	\$270	\$108
4/7/2010	1.2	Drafting discovery tools i.e. requests to admit	MSW	\$195	\$234
4/7/2010	0.1	Discussing case with SCB	MSW	\$195	\$20

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/7/2010	1.5	Work on motion for class certification	BJP	\$270	\$405
4/7/2010	0.1	Review local rules for guidance on withdrawing motion for class cert	BJP	\$270	\$27
4/7/2010	3.2	Emailed with case team re: motion for class cert withdrawal; spoke to BJP re: strategy for class cert; drafted letter to Court re: motion for class cert withdrawal; reviewed discovery demands already prepared; spoke to MSW re: case and discovery demands needed; reviewed correspondence from O/C; edited MSJ; emailed JGB update.	SCB	\$225	\$720
4/8/2010	0.2	Emails to and from case team re: class cert issues.	JGB	\$690	\$138
4/8/2010	1.3	Editing requests to admit	MSW	\$195	\$254
4/8/2010	0.5	Editing requests to admit	MSW	\$195	\$98
4/8/2010	0.4	Edit 56.1 statement and MSJ	BJP	\$270	\$108
4/8/2010	0.4	Editing letter to court re: amending class cert motion.	SS	\$225	\$90
4/8/2010	2.4	Emailed engaged client; reviewed the documents she sent; reviewed edits on discovery docs from BJP; worked on MSJ; searched Westlaw for caselaw for MSJ; incorporated BJP edits to MSJ; created Declaration for MSJ; spoke to MSW re: discovery doc edits and requests to admit; reviewed MSW's requests to admit.	SCB	\$225	\$540
4/8/2010	0.2	Reviewed endorsed letter to Judge Fox re: withdrawing motion to certify class & filing a new motion.	JLN	\$520	\$104
4/8/2010	0.1	Review letter to Judge Fox requesting to withdraw class cert motion	BJP	\$270	\$27
4/9/2010	0.2	Review order; emails to and from case team re: next steps including re: class cert.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/9/2010	0.2	Review B Kliens letter to the court and discuss with SCB	BJP	\$270	\$54
4/9/2010	2.7	Reviewed letter O/C wrote to the Court; discussed with BJP; reviewed Fox order on our class cert letter; skimmed Answer; discussed next steps with case team via email.	SCB	\$225	\$608
4/9/2010	0.3	Reviewed Answer to Amended Complaint	JLN	\$520	\$156
4/11/2010	3.6	Edited motion for class certification; read through Ds' Answer; discussed class cert with BJP; edited requests to admit for discovery.	SCB	\$225	\$810
4/12/2010	0.6	Work on requests to admit	BJP	\$270	\$162
4/12/2010	0.2	E-mails to and from case team re: status of class cert and litigation	JGB	\$690	\$138
4/12/2010	0.1	Reviewed Order of the Court directing parties to file a joint letter, following meeting on April 28, 2010, proposing schedule for completion of discovery	JLN	\$520	\$52
4/12/2010	2.4	Created motion memo for class cert; review local rules and IPRs for class cert motion memo; edited requests to admit; discussed requests to admit and class cert with BJP; reviewed Judge Fox's Order overruling 4/9 Order and emailed case team re: same; reviewed FRCP 26(a) re: initial disclosures; reviewed previous initial disclosures sent to O/C; discussed class cert motion memo with JGB.	SCB	\$225	\$540
4/12/2010	0.1	Line editing Notice of Motion for SCB.	ASD	\$225	\$23
4/13/2010	2.8	Review class cert cases in Second Circuit; e-mails to and from and discussions with case team re: class cert issues; review memo on class cert	JGB	\$690	\$1,932
4/13/2010	1.8	Drafted SAC initial disclosures	MSW	\$195	\$351
4/13/2010	2.8	Work on motion for class certification	BJP	\$270	\$756

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/13/2010	1.2	Discussed class breakdown and definitions with BJP; emailed with case team; started initial disclosures; discussed initial disclosures with MSW; emailed documents to MSW and reviewed what he did for initial disclosures; made phone note for JGB.	SCB	\$225	\$270
4/14/2010	1.5	Review class action internal memos, manual for complex litigation, and case law to aid motion for class cert	BJP	\$270	\$405
4/14/2010	0.5	Review case materials and CSL notes	BJP	\$270	\$135
4/14/2010	0.1	Email Wendy Nagel	BJP	\$270	\$27
4/15/2010	1.3	Evaluate circumstances for each potential lead plaintiff to see who would be ideal for each class/subclass	BJP	\$270	\$351
4/15/2010	0.3	Emailed with BJP re: lead plaintiffs; discussed class definitions and lead plaintiffs with BJP.	SCB	\$225	\$68
4/16/2010	4.7	Work on motion for class certification	BJP	\$270	\$1,269
4/18/2010	1.6	Review memo on class certification; review and edit class cert brief; e-mail to case team re: next steps	JGB	\$690	\$1,104
4/19/2010	0.3	Review emails from JGB/SCB, discuss motion for class cert with JGB	BJP	\$270	\$81
4/19/2010	4.6	Review entire case file and all correspondence in anticipation of meet and confer	JGB	\$690	\$3,174
4/20/2010	0.3	Phone call with class member Julie Johnston.	SCB	\$225	\$68
4/21/2010	0.4	Followed up with class member re: engagement letter; sorted emails; updated class member list.	SCB	\$225	\$90
4/22/2010	0.2	Case meeting to discuss motion for class certification and interrogatories	BJP	\$270	\$54

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/22/2010	1.2	Created phone notes for Julie Johnston and Jaki Baskow; emailed with Baskow; discussed edits and next steps with case team; emailed with potential class member.	SCB	\$225	\$270
4/22/2010	0.2	E-mails to and from case team and co-counsel re: meet and confer	JGB	\$690	\$138
4/26/2010	0.2	PA saved court filing; read through email from JGB.	SCB	\$225	\$45
4/26/2010	2.3	Review previous discovery demands and disclosures; e-mails to and from case team re: meet and confer	JGB	\$690	\$1,587
4/27/2010	0.2	Review emails	BJP	\$270	\$54
4/27/2010	3.6	Edited IJL MSJ; discussed same with BJP; emailed with case team re: same; emailed Klein to confirm 4/28 meeting; printed out necessary documents in preparation for 4/28 meeting; emailed with JGB re: documents and letter; created new discovery timeline and MSJ and Class Cert briefing schedules;	SCB	\$225	\$810
4/27/2010	0.8	Review MSJ brief; e-mails to and from case team re: next steps and meet and confer	JGB	\$690	\$552
4/28/2010	1.3	Meet and confer conference with Bari Klein	BJP	\$270	\$351
4/28/2010	0.3	Attended conference at defense counsel's office re: scheduling discovery & next steps for moving forward	JLN	\$520	\$156
4/28/2010	1.6	Walked to and from Klein's office; scheduling conference; met with case team to discuss next steps; left VM for Class Member.	SCB	\$225	\$360
4/28/2010	2.1	Prepare for meet and confer; discuss meet and confer with case team; go to brief meet and confer with defense counsel; discuss next steps including letter, summary judgment, and class cert with case team	JGB	\$690	\$1,449

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/29/2010	0.9	Find authority for applying the law of all states to class action	BJP	\$270	\$243
4/29/2010	1.7	Write letter to Judge Fox regarding failed meet and confer; work on proposed pretrial schedule	BJP	\$270	\$459
4/29/2010	1.9	Edited letter to the court written by BJP; discussed edits with JGB; entered and discussed same; put together attachments for letter; faxed letter to the court and O/C.	SCB	\$225	\$428
4/29/2010	1.2	Review proposed class cert motion; review and edit drafts of letter to Court updating Court on meet and confer	JGB	\$690	\$828
4/30/2010	1.2	Monthly tune-up; updated case diary and summary document; emailed with class members.	SCB	\$225	\$270
5/3/2010	2.2	Read through MSJ edits; read through invoice; emailed with Class Members; reviewed engagement letter signed by Carrie Crockett; emailed with JLN re: letter to Fox; reviewed invoice.	SCB	\$225	\$495
5/3/2010	0.2	Reviewed letter from JB re discovery plans	JLN	\$520	\$104
5/4/2010	3.1	Emailed with class members; put together initial disclosures; discussed MSJ deadlines with BJP and with case team via email; emailed with JLN re: initial disclosures; sorted emails.	SCB	\$225	\$698
5/4/2010	0.1	E-mails to and from SCB and BJP re: scheduling issues	JGB	\$690	\$69
5/5/2010	0.8	Review supplemental disclosures; e-mails to and from SCB re: such disclosures	JGB	\$690	\$552
5/5/2010	0.2	Review supplemental initial disclosures; review related correspondence btw JLN/JGB/SCB	BJP	\$270	\$54
5/5/2010	2.1	Emailed with case team re: initial disclosures; emailed with JLN re: same; worked on initial disclosures.	SCB	\$225	\$473

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/6/2010	0.1	Discuss MSJ and supplemental disclosures with SCB	BJP	\$270	\$27
5/6/2010	0.4	Review and discuss with SCB initial disclosures	JGB	\$690	\$276
5/6/2010	7.1	Edited initial disclosures; emailed with JLN re: same; researched case law for MSJ; added GBL 349 claim to MSJ; discussed with BJP; discussed initial disclosures and documents exchanged with JGB; reviewed documents previously exchanged; updated master spreadsheet with class members' contact information; created former employee contact list; spoke to class member Kelly Feeney.	SCB	\$225	\$1,598
5/7/2010	3.2	Created engagement letter for Class Member; emailed potential Class Member; edited MSJ; discussed with BJP.	SCB	\$225	\$720
5/7/2010	1	Edit MSJ; discuss with SCB	BJP	\$270	\$270
5/10/2010	0.2	Review JLN's email re: MSJ and discuss with SCB	BJP	\$270	\$54
5/10/2010	0.2	Edit supplemental disclosures and transmittal sheet	BJP	\$270	\$54
5/10/2010	0.3	Call from Wendy Nagel	BJP	\$270	\$81
5/10/2010	0.1	Emails with SA regarding supplemental disclosures and MSJ	BJP	\$270	\$27
5/10/2010	2.7	Made final edits to initial disclosures; sent initial disclosures to opposing counsel via email and hard copy; reviewed Klein's response; worked on MSJ Rule 56.1 statement and made edits to MSJ; emailed MSJ to JLN discussed JLN's response with BJP; discussed next steps with JGB.	SCB	\$225	\$608
5/11/2010	0.3	Case meeting with JGB/SCB	BJP	\$270	\$81
5/11/2010	1.2	Review scheduling order; review and edit MSJ; discuss with case team schedule in case	JGB	\$690	\$828

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/11/2010	3.2	Reviewed Judge Fox order setting discovery schedule; met with case team to discuss next steps; edited discovery demands; emailed with case team re: MSJ.	SCB	\$225	\$720
5/11/2010	0.1	Reviewed Order setting discovery deadline & settlement conf. dates	JLN	\$520	\$52
5/11/2010	0.3	Discussion with SCB re: letter from opposing counsel. Reviewing fax from opposing counsel.	SS	\$225	\$68
5/12/2010	0.5	Edit letter to court; discuss with SCB	BJP	\$270	\$135
5/12/2010	4.1	Reviewed letter from Klein; drafted letter to the Court; worked on letter throughout day incorporating edits from JLN, BJP, and JGB; incorporated JLN edits to discovery demands; emailed with JLN re: same.	SCB	\$225	\$923
5/12/2010	0.4	Read defense counsel letter; discuss response with case team	JGB	\$690	\$276
5/12/2010	0.3	Editing letter to court and discussion with SCB re: same.	SS	\$225	\$68
5/12/2010	0.25	Reviewed Proposed letter to court responding to B.K. letter re: Scheduling	JLN	\$520	\$130
5/12/2010	0.1	Reviewed JGB's letter to court re: scheduling discovery & inflexibility of def. counsel	JLN	\$520	\$52
5/12/2010	2	Reviewed Proposed Doc Requests; Request for Admissions and Interrogatories; Made Edits and Revisions to Same, Sent SA E-mail regarding changes	JLN	\$520	\$1,040
5/12/2010	0.25	Reviewed B.K. E-mail re: scheduling	JLN	\$520	\$130
5/13/2010	0.2	Sort internal and client email; discuss discovery demands with SCB	BJP	\$270	\$54
5/13/2010	1	Research nationwide unjust enrichment classes	BJP	\$270	\$270

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/13/2010	0.7	Review and edit requests for production; review correspondence with defense counsel	JGB	\$690	\$483
5/13/2010	0.7	Read through emails from JGB; reviewed email from JLN and discussed with BJP; updated discovery demands.	SCB	\$225	\$158
5/14/2010	0.4	Discuss requests for production with SCB	JGB	\$690	\$276
5/14/2010	2.9	Discussed MSJ and next steps with BJP; edited MSJ; worked out briefing schedule for MSJ and Class Cert.	SCB	\$225	\$653
5/17/2010	0.9	Editing MSJ and discussion with SCB re: same.	SS	\$225	\$203
5/17/2010	0.45	Reviewed and made edits to MSJ and supporting documents; exchanged E-mails with SA re: same	JLN	\$520	\$234
5/17/2010	2.8	Discussed MSJ with SS; reviewed SS edits and incorporated into MSJ; emailed with JLN re: MSJ and notices of depositions.	SCB	\$225	\$630
5/18/2010	1.3	Review summary judgment and class cert case law; e-mails to and from case team re: next steps and which motions to file	JGB	\$690	\$897
5/18/2010	0.8	Discuss moving for SJ prior to class cert with SCB; review MSW's memo; conduct follow up research; email JGB	BJP	\$270	\$216
5/18/2010	0.4	Formatting MSJ and discussion with SCB re: same.	SS	\$225	\$90
5/18/2010	1	Reviewed AODS and pulled out relevant findings for SJ R-56.1 Statement	JLN	\$520	\$520
5/18/2010	0.5	Meeting with SA re: changes to SJ Motion (For Partial SJ on N.Y. Claims)	JLN	\$520	\$260
5/18/2010	0.75	Research re: filing SJ Motion prior to Certification; E-mails to SA/JB re: same	JLN	\$520	\$390

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/18/2010	2.2	Met with JLN to discuss MSJ; sent AODs to JLN; discussed MSJ timing with SRG; discussed with MSW finding caselaw re: filing of MSJ before class is certified; discussed MSW's research and reviewed memo; emailed with case team re: same; reviewed template of Rule 56.1 statement that JLN sent over; reviewed JLN's suggestions re: Rule 56.1 statement.	SCB	\$225	\$495
5/18/2010	0.1	Discussed MSJ with BJP and SCB.	SRG	\$225	\$23
5/19/2010	0.75	Reviewed final 56.1 Statement and made edits to same; Reviewed final Memorandum of Law	JLN	\$520	\$390
5/19/2010	0.7	Filing and formatting MSJ brief and other documents. Editing same. Discussion with SCB re: same.	SS	\$225	\$158
5/19/2010	2.8	Emailed with JLN re: MSJ; made final edits to MSJ documents; prepped for filing; ECFed all MSJ documents; emailed with case team re: same.	SCB	\$225	\$630
5/20/2010	3.9	Worked on discovery demands; discussed with other analysts; created engagement letter for Lisa Martinez; called court re: MSJ; refiled MSJ Rule 56.1 statement; prepared and delivered courtesy copy of MSJ to the court.	SCB	\$225	\$878
5/20/2010	0.4	Editing discovery demands.	SS	\$225	\$90
5/20/2010	0.8	Reviewed Rule 56.1 Statement file by John G. Balestriere	JLN	\$520	\$416
5/20/2010	0.4	Line edited interrogatories.	LCS	\$225	\$90
5/21/2010	1.1	Review requests to admit; document demands; interrogatories (in conjunction with review of sum doc)	BJP	\$270	\$297
5/21/2010	3.1	Finalized discovery demands; discussed same with BJP; sent discovery demands to O/C via email and USPS; emailed with case team re: depositions; emailed class member engagement letter.	SCB	\$225	\$698

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/21/2010	0.2	E-mails to and from case team and liaison re: MSJ and eventual class cert motion	JGB	\$690	\$138
5/23/2010	0.9	Emailed with case team re: class cert; emailed JLN re: notices of deposition; drafted LaCota deposition; reviewed ijl.com re: addresses for deposed; searched for info on people to depose.	SCB	\$225	\$203
5/24/2010	0.1	Emails and phone calls with case team to discuss filing motion for class cert	BJP	\$270	\$27
5/24/2010	1.9	Emailed with case team re: class cert; emailed with JLN re: notices to depose; created notices to depose for six deponent; emailed and sent via USPS notices to depose to O/C; read through O/C's response.	SCB	\$225	\$428
5/25/2010	0.3	Visit with JLN to discuss filing class cert motion	BJP	\$270	\$81
5/25/2010	2.7	Read through IJL class cert edits; met with JLN and BJP to discuss class cert; saved notices to depose in PA; emailed JGB re: why not to file class cert now; emailed potential class member to set up time to discuss experience.	SCB	\$225	\$608
5/26/2010	0.5	Meeting SAB and BP re: Motion for class certification	JLN	\$520	\$260
5/27/2010	0.6	Spoke to IJL class member; emailed with IJL class member; reviewed signed engagement letter; sorted emails; prepped emails for monthly tune-up.	SCB	\$225	\$135
5/28/2010	0.9	Monthly tune-up; emailed with class members.	SCB	\$225	\$203
5/31/2010	0.3	Emailed lead plaintiffs response to inquiries; sorted emails.	SCB	\$225	\$68
5/31/2010	0.6	Review next set of tasks; write out plan for coming months with apprentice and case team	JGB	\$690	\$414

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/1/2010	0.6	E-mails to and from case team and defense counsel re: scheduling of depositions; review notices to depose	JGB	\$690	\$414
6/1/2010	3.3	Emailed with Class Member; reviewed notices to depose sent from Bari Klein; emailed with case team re: same; reviewed JLN's response; reviewed correspondence between Klein and JGB; drafted engagement letter for Julie Johnston; edited invoice.	SCB	\$225	\$743
6/2/2010	2.4	E-mails to and from case team and defense counsel re: scheduling; review summary judgment papers; draft proposed outline to MSJ response	JGB	\$690	\$1,656
6/2/2010	3.2	Updated engagement letter and sent to Julie Johnston; emailed with Julie Johnston re: response to IJL calls; met with BJP to discuss briefing schedule dates; emailed with case team re: Bari's response; updated PA with all deposition dates; updated summary document; emailed Irram Qadir.	SCB	\$225	\$720
6/2/2010	0.2	Work out schedule with SCB for motions for summary judgment	BJP	\$270	\$54
6/4/2010	5.5	LG case work: researching the issue of nationwide jurisdiction in class action- choice of law	NG	\$265	\$1,458
6/7/2010	4.3	Writing the memo on nationwide class certification and unjust enrichment	NG	\$265	\$1,140
6/8/2010	0.5	Review proposed protective order, discuss with NG and SCB	BJP	\$270	\$135
6/8/2010	0.1	Reviewed endorsed letter addressed to Judge Fox re: briefing schedule for Plaintiffs' partial Motion for Summary Judgment and Defendants Cross Motion	JLN	\$520	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/8/2010	2.2	Read through order from Judge Fox re: MSJ dates; read through confidentiality agreement and emails to and from O/C; discussed confidentiality agreement with case team; emailed same to O/C.	SCB	\$225	\$495
6/9/2010	0.2	Emailed with client; reviewed engagement letter; reviewed emails in Thunderbird.	SCB	\$225	\$45
6/11/2010	0.1	Reviewed Stipulation and Protective Order regarding procedures to be followed that shall govern the handling of confidential material	JLN	\$520	\$52
6/13/2010	2.3	Review all requests for production; review discovery schedule; e-mails to case team re: discovery	JGB	\$690	\$1,587
6/14/2010	0.1	Confirmed due dates for discovery materials; emailed Klein re: discovery demand deadline.	SCB	\$225	\$23
6/15/2010	0.4	Reviewed docs sent by Julie Johnston and emailed with her; emailed Irram Qadir.	SCB	\$225	\$90
6/16/2010	0.6	Discuss general case plan with outside counsel	JGB	\$690	\$414
6/17/2010	0.6	Reviewed deadlines; emailed with JGB re: next steps for discovery.	SCB	\$225	\$135
6/18/2010	3.3	Researched unjust enrichment claim, and how (or whether) federal courts certify classes based on that claim; researched best arguments that can be made to persuade the court to certify a class based on unjust enrichment claim.	NG	\$265	\$875
6/21/2010	6.5	Working on unjust enrichment memo for IJL: whether we will be able to get our class certified in SDNY.	NG	\$265	\$1,723
6/21/2010	0.1	Read through IJL email from Klein with discovery responses.	SCB	\$225	\$23
6/22/2010	6.5	Finished IJL unjust enrichment memo.	NG	\$265	\$1,723
6/22/2010	0.5	Reviewed IJL file for Sandra Burga; took notes re: same	JLN	\$520	\$260

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/22/2010	0.7	Reviewed IJL file for Karen Malak; took notes re: same	JLN	\$520	\$364
6/22/2010	0.6	Reviewed IJL file for Christine Rodriguez; took notes re: same	JLN	\$520	\$312
6/22/2010	0.75	Reviewed IJL History CD; took notes re: same	JLN	\$520	\$390
6/22/2010	2.8	Review discovery responses from defendant; discuss discovery schedule with case team	JGB	\$690	\$1,932
6/22/2010	0.8	Skimmed through discovery responses and documents produced; responded to O/C and emailed case team; discussed next steps with BJP; emailed with Class Member.	SCB	\$225	\$180
6/23/2010	6.8	Reading the documents produced by IJL defendants in discovery. Taking notes for second document production and interrogatories request.	NG	\$265	\$1,802
6/23/2010	0.5	Review O/C's discovery demands	BJP	\$270	\$135
6/23/2010	0.5	Reviewed IJL file for Janeen Cameron; took notes re: same	JLN	\$520	\$260
6/23/2010	0.7	Reviewed IJL file for Lisa Bruno; took notes re: same	JLN	\$520	\$364
6/23/2010	0.8	Reviewed IJL file for Karen McBride; took notes re: same	JLN	\$520	\$416
6/23/2010	0.6	Reviewed IJL file for James Tortora; took notes re: same	JLN	\$520	\$312
6/23/2010	0.4	Discussed doc review with NG; emailed with former class member re: refund.	SCB	\$225	\$90
6/23/2010	0.4	Review NG's memo on nationwide unjust enrichment class	BJP	\$270	\$108

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/24/2010	5.8	Finished reading all the documents produced by the IJL defendant in discovery. Notes for second document production request and second set of interrogatories.	NG	\$265	\$1,537
6/24/2010	0.7	Discussed IJL discovery documents and next steps with NG; reviewed Defendants' discovery demands.	SCB	\$225	\$158
6/24/2010	0.2	Reviewed Harry & Sally Welcome Package	JLN	\$520	\$104
6/24/2010	0.4	Reviewed IJL New Hire Booklet	JLN	\$520	\$208
6/24/2010	0.2	Reviewed IJL Info Call Script	JLN	\$520	\$104
6/25/2010	0.2	Discussed response due date with BJP; dropped off documents to JLN.	SCB	\$225	\$45
6/25/2010	0.1	Discuss discovery demands with SCB	BJP	\$270	\$27
6/25/2010	3.1	Finished Review of FDU Manual; took notes re: same	JLN	\$520	\$1,612
6/25/2010	2.75	Started review of FDU Manual; took notes re: same	JLN	\$520	\$1,430
6/26/2010	3.4	Started review IJL's Director Handbook; took notes re: same	JLN	\$520	\$1,768
6/27/2010	2.6	Reviewed IJL's Coordinator Manual (Vol I); took notes re: same	JLN	\$520	\$1,352
6/27/2010	0.1	Sorted emails.	SCB	\$225	\$23
6/28/2010	5.9	Working on demands for document production and interrogatories for IJL	NG	\$265	\$1,564
6/28/2010	1.3	Took notes on discovery documents submitted by Defendants.	NG	\$265	\$345
6/28/2010	0.8	Emails with O/C/JLN/JGB and meet with JGB/SCB re: dropping Tortora as a lead plaintiff; research necessary procedural device	BJP	\$270	\$216

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/28/2010	0.7	Discuss plaintiff Tortorra and amending issue; follow up with case team re: discovery issues	JGB	\$690	\$483
6/28/2010	2.1	Reviewed IJL's Coordinator Manual (Vol. II)	JLN	\$520	\$1,092
6/28/2010	0.9	Discussed discovery demands with Christine Rodriguez; saved docs in PA; met with case team to discuss Tortora; emailed with case team re: same.	SCB	\$225	\$203
6/29/2010	0.6	Reviewed IJL Policies & Dolan Policy Memo re: lying to customers	JLN	\$520	\$312
6/29/2010	3.6	Started reviewed IJL Franchise Agreement; took notes re: same	JLN	\$520	\$1,872
6/29/2010	0.4	Explained case status with JSZ; typed up order dates for PA.	SCB	\$225	\$90
6/30/2010	0.1	Discussion with SCB re: cross-motion and reviewing filing notifications.	SS	\$225	\$23
6/30/2010	0.9	Case tune-up; reviewed CMSJ filings; discussed discovery with BJP.	SCB	\$225	\$203
6/30/2010	1.7	Finished review of IJL's Franchise Agreement; took notes re: same	JLN	\$520	\$884
6/30/2010	2.6	Reviewed Opposition Brief, Opposition to Plaintiff's's Rule 56.1 Statement and Answering Defendants Statement of Additional Facts; took notes re: same	JLN	\$520	\$1,352
6/30/2010	1.2	Reviewed Defendants' Motion for Partial Summary Judgment; took notes re: same	JLN	\$520	\$624
7/1/2010	0.6	Review of motion to compel draft	JGB	\$690	\$414
7/1/2010	0.4	Emails with JLN re: responding to Klein's various emails	BJP	\$270	\$108
7/1/2010	2.3	Review defendant motion for summary judgment papers	JGB	\$690	\$1,587

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/1/2010	0.9	Review CMSJ; email with SCB	BJP	\$270	\$243
7/1/2010	4.1	Scanned in all discovery demands for named-plaintiffs; emailed with JLN and BJP re: discovery demands and motion to compel caselaw; read through CMSJ brief; emailed with BJP re: same; scheduled phone meetings with potential class member; spoke to Kelly Feeney re: engagement letter status; reviewed invoice.	SCB	\$225	\$923
7/2/2010	2.8	Review MSJ documents and cases, including re: SoL	JGB	\$690	\$1,932
7/2/2010	0.7	Drafted motion memo and emailed with case team re: same.	SCB	\$225	\$158
7/2/2010	0.5	Email JLN about picking up Defendant's production; pick up docs from JLN	BJP	\$270	\$135
7/2/2010	0.1	Emails with SCB re: filing date of Plaintiff's MSJ; O/C's need to file a CSMJ	BJP	\$270	\$27
7/3/2010	4.1	Prepared MOL in Opposition for Partial Summary Judgment	JLN	\$520	\$2,132
7/5/2010	1.1	Review Defendant's responses to discovery demands	BJP	\$270	\$297
7/6/2010	0.7	Emails with JLN re: letter to Klein; schedule meeting; discuss next steps with JLN/SCB	BJP	\$270	\$189
7/6/2010	0.4	Discuss motion memo and next steps with JGB/SCB; talk with AAA about assisting with writing the reply	BJP	\$270	\$108
7/6/2010	0.2	Discussed matter with SCB and BJP	AAA	\$255	\$51
7/6/2010	1.1	Review D's reply brief, research cases on statute of limitations issue; discuss with SCB; discuss with JGB/SCB	BJP	\$270	\$297

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/6/2010	4.9	Sorted emails; met with JLN and BJP re: good faith letter and CMSJ; met with JGB and BJP re: CMSJ; discussed CMSJ with AAA; discussed discovery with NG; sorted through Defendants' document production and saved all documents in PA; emailed all lead-plaintiffs their discovery demands.	SCB	\$225	\$1,103
7/6/2010	0.6	Take notes on deficiencies of document request reply	BJP	\$270	\$162
7/7/2010	6.1	Read through each lead-plaintiffs' discovery demands; compared to Packman responses; discussed CMSJ reply with BJP; explained case and discussed same with AAA; discussed SoL issue with BJP; emailed with JLN re: discovery demands and meeting to discuss same; met with JGB and BJP re: SoL issue and removing MSJ.	SCB	\$225	\$1,373
7/7/2010	2.8	Read IJL's opposition and cross MSJ and discussed statute of limitations issue with SCB	AAA	\$255	\$714
7/7/2010	5.1	Reviewed and briefed cases for case cheat sheet.	AAA	\$255	\$1,301
7/7/2010	5.6	Research for reply for MSJ; create TOC; discuss with SCB; discuss SOL issues with SCB/JGB	BJP	\$270	\$1,512
7/7/2010	1.4	Review O/C's discovery responses to prepare good faith letter to Klein; discuss with SCB	BJP	\$270	\$378
7/7/2010	2.4	Researched case law re: boilerplate objections and obstructionist tactics in discovery & potential remedies	JLN	\$520	\$1,248
7/7/2010	0.4	Reviewed e-mail correspondence b/w Janeen Cameron & SAB re:	JLN	\$520	\$208
7/8/2010	5.2	Met with BJP and JLN to discuss CMSJ opposition and discovery; reviewed MTD re: statute of limitations issues; emailed with case team re: same; discussed good faith letter with BJP; discussed discovery needs and MSJ withdrawal with NG; emailed with NG re: procedure on withdrawing MSJ.	SCB	\$225	\$1,170

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/8/2010	4.2	Meeting with JLN/SCB to discuss MSJ reply and letter to BK; discuss next steps with SCB; write letter to BK; research SOL issues and review D's amended MTD	BJP	\$270	\$1,134
7/8/2010	1.8	IJL: Plaintiff J. Cameron. Responding to Interrogatories	NG	\$265	\$477
7/8/2010	1.7	IJL: Plaintiff J. Cameron. Responding to Request to Produce	NG	\$265	\$451
7/8/2010	1.7	IJL: Plaintiff J. Cameron. Responding to Request to Admit	NG	\$265	\$451
7/8/2010	1.2	IJL: Researching the Topic of Withdrawal of a Motion for Summary Judgment	NG	\$265	\$318
7/8/2010	0.3	Discuss issues with SCB: procedural next steps, amending complaint with new plaintiffs, proposal/opposition	BJP	\$270	\$81
7/8/2010	1.6	Read our MSJ and statutory law backing claims.	AAA	\$255	\$408
7/8/2010	1	Meeting w/BP and SA re: response to Def. MTD., response to their disc demands & getting responses to our demands	JLN	\$520	\$520
7/8/2010	1.8	Started drafting letter outlining all deficiencies in defendants' responses to plaintiffs' request for admissions, plaintiffs' interrogatories and plaintiffs' document demands	JLN	\$520	\$936
7/8/2010	1	IJL's discovery demands, with attachments.	JLN	\$520	\$520
7/8/2010	0.2	Watch IJL History Video	BJP	\$270	\$54
7/9/2010	2.3	Discuss MSJ issues with staff; meet with staff and co-counsel re: variety of issues; review SoL cases and rules	JGB	\$690	\$1,587
7/9/2010	2.9	IJL: Plaintiff Bruno. Responding to Interrogatories	NG	\$265	\$769

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/9/2010	1.9	IJL: Plaintiff Bruno. Responding to Request to Produce	NG	\$265	\$504
7/9/2010	1.6	IJL: Plaintiff Bruno. Responding to Request to Admit.	NG	\$265	\$424
7/9/2010	4.1	Met with case team to discuss next steps; emailed with lead plaintiffs to confirm phone calls; reviewed Klein declaration and court-filing; worked on discovery compel letter with BJP; emailed and mailed letter to Klein; discussed discovery responses with NG.	SCB	\$225	\$923
7/9/2010	0.3	Emails with Klein re: lack of Declaration in opposition	BJP	\$270	\$81
7/9/2010	5.3	Review D's production, work into good faith letter to Klein, discuss with SCB; research for reply to MSJ; discuss MSJ issues with JGB; email JLN re: waiver issue; meet with JLN/JGB/SCB	BJP	\$270	\$1,431
7/9/2010	0.25	Meeting with JB/SA/BP re: SOL waiver and Joinder of add/plaintiffs	JLN	\$520	\$130
7/9/2010	2.7	Finished deficiency letter: re defendants' failure to properly respond to plaintiffs' discovery demands	JLN	\$520	\$1,404
7/11/2010	0.6	Updated sum doc; sorted emails.	SCB	\$225	\$135
7/12/2010	4.9	Spoke to Lisa Bruno re: discovery demands; spoke to Janeen Cameron re: new time to call; reviewed and put together all documents for Plaintiffs' production; emailed JLN re: same; emailed with Burga and McBride re: discovery demands; emailed with Andy Woolf; discussed next steps with BJP.	SCB	\$225	\$1,103
7/12/2010	0.1	Discuss statute of limitation issue with BJP	JGB	\$690	\$69
7/12/2010	8.5	Research/write reply for MSJ; discuss research with AAA/SCB/JGB; email JLN; research amendment/intervenor procedures	BJP	\$270	\$2,295

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/12/2010	1.6	Drafting Responses to Requests for Admission for Cameron.	NG	\$265	\$424
7/12/2010	1.8	Drafting Responses to Interrogatories for Cameron.	NG	\$265	\$477
7/12/2010	1.8	Drafting Response to Interrogatories for P. Malak	NG	\$265	\$477
7/12/2010	1.8	Drafting Responses to Request to Admit for Malak.	NG	\$265	\$477
7/13/2010	4.6	Research intervenor issue; emails with JLN; call with JLN/SCB; email O/C re: letter to court requesting extension of time to file reply, exchange emails with O/C; write letter to court re: withdrawing motion and Rule 21 motion; write new letter to court requesting 2 week extension of time for Reply; meetings with SCB/JGB re: which letter to send	BJP	\$270	\$1,242
7/13/2010	0.1	Listen to message from JLN	BJP	\$270	\$27
7/13/2010	0.1	Email JGB/JLN re: adding Berkowitz	BJP	\$270	\$27
7/13/2010	1.8	Drafting Responses to Requests to Admit for Rodriguez.	NG	\$265	\$477
7/13/2010	1.9	Drafting Responses to Requests to Admit for Tortora.	NG	\$265	\$504
7/13/2010	1.9	Drafting Responses to Interrogatories for Tortora	NG	\$265	\$504
7/13/2010	1.7	Drafting Responses to Interrogatories for Rodriguez.	NG	\$265	\$451
7/13/2010	4.2	Worked on discovery demand responses; discussed next steps with BJP; attempted to call Sandra Burga; spoke with Karen Malak re: demand responses; emailed with potential class representative and discussed with case team; looked into procedure for adding plaintiff.	SCB	\$225	\$945

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/14/2010	6.1	Researched caselaw for Rule 21 Motion; drafted Rule 21 Motion; attempted calling Burga re: discovery; discussed discovery response status with NG; emailed with NG re: template for Rule 21 motion; reviewed NG's research re: same.	SCB	\$225	\$1,373
7/14/2010	1.2	Updating Bruno's File After Telephone Conversation.	NG	\$265	\$318
7/14/2010	1.4	Researching Samples of Filed Motions/Forms re: How to Add a Party to Existing Class in a Class Action in SDNY.	NG	\$265	\$371
7/15/2010	3.7	Continued working on Rule 21 motion to add a party; emailed with NG re: discovery production.	SCB	\$225	\$833
7/15/2010	1.7	Drafting Responses to Interrogatories for McBride	NG	\$265	\$451
7/15/2010	1.7	Drafting Responses to Interrogatories for Burga	NG	\$265	\$451
7/15/2010	1.9	Drafting Responses to Requests to Admit for Burga	NG	\$265	\$504
7/15/2010	1.9	Drafting Responses to Requests to Admit for McBride	NG	\$265	\$504
7/16/2010	2.4	Read through and edited discovery demand responses thus far; discussed with NG; emailed with JLN re: next steps.	SCB	\$225	\$540
7/16/2010	0.4	Updating Cameron's Responses to Requests to Admit After Telephone Call.	NG	\$265	\$106
7/16/2010	3.8	Drafting Instructions for Responses to Doc. Demands, Interrogatories, Requests to Admit.	NG	\$265	\$1,007
7/16/2010	2.8	Drafting Responses to Doc. Production Request for Lead Plaintiffs.	NG	\$265	\$742
7/16/2010	0.25	Phone Call to Janeen Cameron re: Requests for Admissions, Interrogatories.	NG	\$265	\$66

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/16/2010	3.8	Started working on plaintiff's reply brief in further support of plaintiffs' motion for partial SJ on NY claims; drafted detailed outline w/point headings & subheadings & anticipated args. that will go into each section	JLN	\$520	\$1,976
7/16/2010	2.2	Reviewed and made edits/revisions to requests for admissions for Janeen Cameron	JLN	\$520	\$1,144
7/16/2010	2.25	Research re motion to intervene under Rule 21 & Rule 24	JLN	\$520	\$1,170
7/16/2010	2.1	Reviewed and made edits/revisions to interrogatory responses for Sandra Burga	JLN	\$520	\$1,092
7/16/2010	1.6	Reviewed and made edits/revisions to doc. responses for Sandra Burga	JLN	\$520	\$832
7/17/2010	2.9	Began drafting preliminary statement for reply brief	JLN	\$520	\$1,508
7/17/2010	1.8	Finished preliminary statement for reply br.	JLN	\$520	\$936
7/17/2010	1.3	T/c w/Yollanda London Osborne (IJL Client ? Hartford, Connecticut) re: her experiences w/IJL, her attempts to get refunds, her filing of complaint w/BBB, & her potential interest in joining class action as a lead plaintiff for Fla. Call Center claims	JLN	\$520	\$676
7/17/2010	2.4	Reviewed and made edits/revisions to requests for admissions for Karen Malak	JLN	\$520	\$1,248
7/17/2010	1.4	Reviewed and made edits/revisions to doc. responses for Karen Malak	JLN	\$520	\$728
7/17/2010	2.1	Reviewed and made edits/revisions to requests for admissions for Janeen Cameron	JLN	\$520	\$1,092
7/17/2010	2.2	Created new versions of Plaintiffs' discovery responses; edited and sent to JLN for review.	SCB	\$225	\$495

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/18/2010	2.4	Researched case law cited by defendants in their motion for partial summary judgment on NY claims	JLN	\$520	\$1,248
7/18/2010	2.3	Reviewed and made edits/revisions to requests for admissions for James Tortura	JLN	\$520	\$1,196
7/18/2010	1.1	Reviewed and made edits/revisions to doc. responses for James Tortora	JLN	\$520	\$572
7/18/2010	2.1	Reviewed and made edits/revisions to interrogatory responses for James Tortora	JLN	\$520	\$1,092
7/18/2010	2.7	Drafted section in reply br. re: all NY franchises followed the same illegal practice	JLN	\$520	\$1,404
7/19/2010	0.4	Spoke to Class Member re: small claims action; read through NG email.	SCB	\$225	\$90
7/19/2010	4.3	Editing Responses to Requests to Admit and Interrogatories.	NG	\$265	\$1,140
7/19/2010	0.4	Drafting the List of Questions that Need to be Answered by Plaintiffs Who Did not Respond to Request to Admit and Interrogatories.	NG	\$265	\$106
7/19/2010	1.9	Familiarizing with Documents Produced by Plaintiffs	NG	\$265	\$504
7/19/2010	2.1	Reviewed and made edits/revisions to interrogatory responses re: Christine Rodriguez	JLN	\$520	\$1,092
7/19/2010	2.8	Finished section of reply brief responding to defendants' claim that overcharging NY clients was not a deceptive act	JLN	\$520	\$1,456
7/19/2010	3.1	Continued research of case law cited by defendants in their partial motion for SJ	JLN	\$520	\$1,612
7/19/2010	1.9	Reviewed and made edits/revisions to doc. responses for Christine Rodriguez	JLN	\$520	\$988
7/19/2010	0.9	Drafted section of reply br. responding to defendants' constitutional challenge re: GBL 349	JLN	\$520	\$468

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/20/2010	2.3	Discussed discovery responses with NG; emailed lead plaintiffs re: remaining responses; emailed class member Irram Qadir; spoke with BJP and JLN re: next steps; reviewed CMSJ for Vandor Affidavit; emailed with JLN.	SCB	\$225	\$518
7/20/2010	0.8	Emails with JLN re: afternoon call; call with JLN/SCB; speak to NG re: researching FRCP 21/24 comparison	BJP	\$270	\$216
7/20/2010	4.8	Continued legal research re: special mootness/tolling rules for class actions prior to cert	JLN	\$520	\$2,496
7/20/2010	2.4	Researched mootness/tolling rules in other fed. Circuits	JLN	\$520	\$1,248
7/20/2010	4.2	Researched re: special mootness rules in class action context prior to certification	JLN	\$520	\$2,184
7/20/2010	2.1	Reviewed and made edits/revisions to doc. responses for L. Bruno	JLN	\$520	\$1,092
7/20/2010	2.4	Reviewed and made edits/revisions to interrogatory responses re: Bruno	JLN	\$520	\$1,248
7/21/2010	0.2	E-mails between case team re: discovery scheduling	JGB	\$690	\$138
7/21/2010	3.2	Discussed discovery responses with JLN; emailed with Klein re: discovery extension; spoke with EMJ re: edits to discovery documents; edited requests for admission.	SCB	\$225	\$720
7/21/2010	2.3	Edited Plaintiffs' Responses to Defendants' First Set of Requests for Admission.	EMJ	\$195	\$449
7/21/2010	4.2	Edited Plaintiffs' Responses to Defendants' First Set of Interrogatories.	EMJ	\$195	\$819
7/21/2010	0.5	Touch base with NG re: Motion under 21/24, review her research, review motions in limine	BJP	\$270	\$135

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/21/2010	1.9	Familiarizing With Documents Produced, Court Orders, Motions	NG	\$265	\$504
7/21/2010	1.1	Editing Response to Doc. Production Request	NG	\$265	\$292
7/21/2010	2.3	Drafting Instructions to Response to Doc. Production and Request to Admit.	NG	\$265	\$610
7/21/2010	4.6	Legal research re: lead plaintiff's claims mooted but courts allow time to find new plaintiff	JLN	\$520	\$2,392
7/21/2010	2.7	Researched case law re: outright dismissal as too harsh a penalty to unnamed class members	JLN	\$520	\$1,404
7/21/2010	1.9	Reviewed and made edits/revisions to requests for admissions for K. McBride	JLN	\$520	\$988
7/21/2010	1.1	Reviewed and made edits/revisions to interrogatory responses for K. McBride	JLN	\$520	\$572
7/21/2010	2.2	Reviewed and made edits/revisions to doc. responses for K. McBride	JLN	\$520	\$1,144
7/22/2010	4.6	Legal research re: tolling rules for class action as set forth by Supreme Court & progeny of those cases	JLN	\$520	\$2,392
7/22/2010	3.8	Continued research re: tolling rules for class action as set forth by Supreme Court & progeny	JLN	\$520	\$1,976
7/22/2010	2.4	Started process of making edits/revisions to reply brief	JLN	\$520	\$1,248
7/23/2010	0.6	Edit Responses to Request for Admission	MJF	\$195	\$117
7/23/2010	0.8	Edit Responses to Request for Admission	MJF	\$195	\$156
7/23/2010	0.6	Edit Response to Request for Admission	MJF	\$195	\$117
7/23/2010	3.1	Editing Responses to Interrogatories Using Feedback from JLN.	NG	\$265	\$822

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/23/2010	1.2	Reading IJL's SAC- Extracting Information to Supplement Responses to Requests for Document Production and Interrogatories.	NG	\$265	\$318
7/23/2010	0.4	Editing Plaintiffs' Documents Produced in Discovery	NG	\$265	\$106
7/23/2010	3.6	Finished edits & revisions to reply brief	JLN	\$520	\$1,872
7/23/2010	3.5	Legal research re: allowing intervention of new plaintiff in putative class action	JLN	\$520	\$1,820
7/23/2010	3.1	Legal research re: relation-back principles in class action context where original plaintiff's claims are deemed untimely	JLN	\$520	\$1,612
7/24/2010	1.6	Reviewed AOD's & extracted all relevant findings re: illegal provisions in IJL's New York contracts; exported same into first draft of opp brief to def. MSJ	JLN	\$520	\$832
7/24/2010	3.9	Legal research re: unjust enrichment claims being allowed where underlying contract is deemed illegal/unenforceable	JLN	\$520	\$2,028
7/24/2010	2.8	Continued research re: permitting unjust enrichment claim for illegal/unenforceable contracts	JLN	\$520	\$1,456
7/25/2010	1.4	Drafted preliminary statement for opposition brief & footnotes 1 & 2.	JLN	\$520	\$728
7/25/2010	0.9	Compiled all cases obtained through legal research & combined into one bound volume	JLN	\$520	\$468
7/25/2010	3.9	Reviewed bound volume & highlighted all relevant quotes for possible use in opp. brief	JLN	\$520	\$2,028
7/25/2010	4.6	Extracted all quotes from research & imported same into draft opp brief to def. SJ motion	JLN	\$520	\$2,392
7/26/2010	0.1	E-mail to and from SCB re: discovery planning	JGB	\$690	\$69
7/26/2010	3.9	Drafting a Motion to Intervene	NG	\$265	\$1,034

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/26/2010	0.3	Review precedent documents for Rule 24 motion, email NG to discuss	BJP	\$270	\$81
7/26/2010	0.2	Emails with SCB re: call with O/C; read emails btw SCB/JLN re: call with O/C	BJP	\$270	\$54
7/26/2010	3.4	Began drafting section of brief re: special mootness rules in class actions	JLN	\$520	\$1,768
7/26/2010	4.25	Continued drafting section of brief re: special mootness rules in class action context	JLN	\$520	\$2,210
7/26/2010	2.9	Finished section re: special mootness rules in class action context	JLN	\$520	\$1,508
7/26/2010	3.5	Emailed and spoke with JLN re: discovery materials and meeting; emailed with O/C re: time to speak about discovery demands; continued working on discovery materials.	SCB	\$225	\$788
7/27/2010	6.8	Worked on Rodriguez discovery responses; met with JLN to discuss responses and next steps; emailed with potential class member.	SCB	\$225	\$1,530
7/27/2010	3.5	Edit Rule 24 Motion	BJP	\$270	\$945
7/27/2010	5.1	Drafting a Motion to Intervene	NG	\$265	\$1,352
7/27/2010	2.1	Drafted section re: fundamental unfairness to unnamed plaintiffs if NY claims were dismissed	JLN	\$520	\$1,092
7/27/2010	4.6	Began drafting section re: defendants' arguments being against weight of authority	JLN	\$520	\$2,392
7/27/2010	3.5	Finished drafting section re: against weight of authority	JLN	\$520	\$1,820

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/28/2010	7.9	Created affidavits for Bruno, Rodriguez, and Berkowitz; called O/C with JLN and BJP re: Plaintiffs' discovery demands; implemented edits from JLN for Rodriguez discovery responses; sorted emails; emailed with Berkowitz and Bruno; discussed discovery production table with EMJ; discussed next steps with BJP.	SCB	\$225	\$1,778
7/28/2010	1.9	Create/edit 56.1 answer	BJP	\$270	\$513
7/28/2010	3.2	Created spreadsheets of all documents contained in Plaintiffs' First Doc Production.	EMJ	\$195	\$624
7/28/2010	0.3	Review Vandor affidavit in order to edit Rodriguez affidavit; Edit Rodriguez affidavit	BJP	\$270	\$81
7/28/2010	1.6	Case discussion with JLN/SCB; Call with O/C re: discovery demands	BJP	\$270	\$432
7/28/2010	2.6	Edit Rule 24 Motion; discuss edits with NG	BJP	\$270	\$702
7/28/2010	4.1	Drafting a Motion to Intervene	NG	\$265	\$1,087
7/28/2010	0.6	T/c w/ defense counsel re: outstanding discovery & setting up depositions of non-parties A.Valesquez, M.LePage, Jill Vandor & Robert Vandor, & non-availability of Karen Malek due to pregnancy	JLN	\$520	\$312
7/28/2010	3.6	Began drafting section re: commencement of class action tolls SOL & proposed intervenor's claims relate back	JLN	\$520	\$1,872
7/28/2010	2.9	Continued drafting section re: commencement of class action tolls SOL & relation-back of Berkowitz claims	JLN	\$520	\$1,508
7/29/2010	0.3	Reviewed IJL affidavit.	SRG	\$225	\$68
7/29/2010	0.8	Editing Tortora's Response to Interrogatories	NG	\$265	\$212
7/29/2010	0.8	Editing Burga's Response to Interrogatories	NG	\$265	\$212
7/29/2010	0.7	Editing Malak's Response to Interrogatories	NG	\$265	\$186

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/29/2010	0.8	Editing McBride's Response to Interrogatories	NG	\$265	\$212
7/29/2010	0.8	Editing Bruno's Response to Interrogatories	NG	\$265	\$212
7/29/2010	0.8	Editing Cameron's Response to Interrogatories	NG	\$265	\$212
7/29/2010	3.6	Drafting a Motion to Intervene	NG	\$265	\$954
7/29/2010	8.3	Discuss Rule 24 Motion with NG; Research Class Rep Case Law; edit/write Rule 24 Motion	BJP	\$270	\$2,241
7/29/2010	2.5	Research case law for how to respond to IJL's 56.1 statements, emails with JLN on how to respond; work with SCB to complete 56.1 answer	BJP	\$270	\$675
7/29/2010	3.1	Started section re: unjust enrichment & right to pursue claim based on illegal contracts	JLN	\$520	\$1,612
7/29/2010	2.9	Finished section re: unjust enrichment & right to pursue claim based on illegal/unenforceable contracts	JLN	\$520	\$1,508
7/29/2010	4.2	Finished section re: tolling/relation-back principles	JLN	\$520	\$2,184
7/29/2010	9.3	Edited affidavits for Rodriguez, Bruno, and Berkowitz; emailed with these plaintiffs; edited and added to Opposition to Rule 56.1 Statement; continued to add Rodriguez discovery response edits; worked on Bruno, Cameron, and Malak discovery responses; discussed same with JLN.	SCB	\$225	\$2,093
7/30/2010	7.1	Edit/write/review Rule 24 Motion, Opposition to MSJ, Reply to MSJ, Discovery Responses, Rule 56.1 Statement, JLN Declaration and Exhibits	BJP	\$270	\$1,917
7/30/2010	1.1	Picked up signed affidavit from new plaintiff.	EMJ	\$195	\$215
7/30/2010	0.2	Discuss privilege log with SCB; review documents for potential redaction	BJP	\$270	\$54
7/30/2010	0.5	Emails with SCB/JLN re: edits and miscellaneous questions	BJP	\$270	\$135

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/30/2010	0.8	Read/edit JLN's MSJ Reply	BJP	\$270	\$216
7/30/2010	0.5	Edit Rule 24 Motion	BJP	\$270	\$135
7/30/2010	0.5	Prepared Declaration in Opposition to Cross Motion Notice of Cross-Motion	JLN	\$520	\$260
7/30/2010	2.8	Finalized changes for opposition brief to def. partial SJ motion	JLN	\$520	\$1,456
7/30/2010	0.9	Reviewed Reply Memorandum of Law in Support Motion for Summary Judgment	JLN	\$520	\$468
7/30/2010	3.5	Continued making edits/revisions to final draft	JLN	\$520	\$1,820
7/30/2010	2.4	Began process of edits/revisions to final draft of opposition brief	JLN	\$520	\$1,248
7/30/2010	3.2	Researched case law cited by defendant's in their motion	JLN	\$520	\$1,664
7/30/2010	9.6	Worked on discovery responses; edited same and sent to O/C; edited Rule 24 Motion; edited MSJ Reply brief; edited CMSJ opposition brief; put together tables of contents and tables of authorities for all briefs; filed all briefs via ECF; monthly tune-up responsibilities.	SCB	\$225	\$2,160
8/2/2010	0.3	Discuss follow-up letter to O/C; emails with JLN re: input	BJP	\$270	\$81
8/2/2010	3.2	Put together courtesy copies for Magistrate Judge Fox of Friday's court-filings; put together hard copies of discovery response for O/C; discussed next steps with BJP; emailed with JLN re: next steps; saved all court-filed documents in PA; read through reply and opposition briefs.	SCB	\$225	\$720
8/3/2010	0.1	Emailed potential class member.	SCB	\$225	\$23

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/4/2010	4.5	Edited letter to Klein re: supplemental discovery; put together discovery responses for Tortora, Burga, and McBride; called Burga twice; emailed with JLN re: letter to Klein; sent letter to Klein; sorted emails; listened to vmail from Burga and attempted calling once again.	SCB	\$225	\$1,013
8/4/2010	0.6	Review discovery status; review e-mail to defense counsel; touch base with case team on discovery	JGB	\$690	\$414
8/4/2010	1.2	Write letter to O/C re: supplementing discovery responses per the terms of the conversation of July 28, 2010	BJP	\$270	\$324
8/4/2010	0.8	Letter to BK follow up re discovery dispute	JLN	\$520	\$416
8/5/2010	4.3	Making edits to Burga, McBride, and Tortora responses; printed out all documents to be delivered to O/C; spoke to Burga re: requests for admission; emailed with JLN re: discovery responses.	SCB	\$225	\$968
8/6/2010	1.9	Prepped doc production log and affidavits of service for discovery responses; delivered discovery responses to O/C; emailed affidavit of service to O/C.	SCB	\$225	\$428
8/9/2010	0.6	Created valuation memo.	SCB	\$225	\$135
8/10/2010	0.1	Reviewed letter from defense counsel re: proposed deposition schedule	JLN	\$520	\$52
8/10/2010	0.3	Read through letter from Klein; emailed to JLN and BJP.	SCB	\$225	\$68
8/12/2010	0.1	E-mail to defense counsel re: unavailability on one of proposed dep. dates due to holiday	JLN	\$520	\$52
8/12/2010	0.2	Reviewed letter from BK re depositions	JLN	\$520	\$104
8/12/2010	0.3	Emailed with case team re: discovery letter; skimmed over Defendants' supplemental responses.	SCB	\$225	\$68

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/16/2010	0.1	Read forwarded JLN emails	BJP	\$270	\$27
8/16/2010	0.2	Review IJL's supplemental discovery response and exhibits	BJP	\$270	\$54
8/16/2010	3.1	Reviewed letter from Klein; reviewed emails from JLN re: next steps; emailed all lead plaintiffs re: deposition dates; reviewed responses re: same; discussed next steps with BJP; sorted emails.	SCB	\$225	\$698
8/16/2010	0.1	Read emails from JLN	BJP	\$270	\$27
8/17/2010	1.3	E-mails to and from defense counsel and case team re: discovery scheduling; discuss with case team depositions and discovery	JGB	\$690	\$897
8/17/2010	0.8	Read/respond to emails btw case team and O/C re: Klein's request for an extension and deposition scheduling; emails and phone calls with case team regarding deposition scheduling	BJP	\$270	\$216
8/17/2010	0.7	Drafted letter to BK re: deposition dates, availability & unavailability of named plaintiffs, list of all witnesses plaintiff would like to depose & other witnesses in Florida & California to be deposed	JLN	\$520	\$364
8/17/2010	5.1	Emailed with JLN and BJP re: depositions, letter to Klein, page increase for Defendants' brief, etc.; emailed with Plaintiffs to coordinate taking of depositions; drafted letter response to Klein; incorporated edits; faxed over letter response to Klein; sorted emails.	SCB	\$225	\$1,148
8/17/2010	0.3	Edits to letter to O/C	BJP	\$270	\$81
8/18/2010	0.1	Read BK's letter to court requesting additional pages/Fox's denial	BJP	\$270	\$27
8/18/2010	0.4	Case meeting with JGB/SCB	BJP	\$270	\$108

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/18/2010	2.2	Reviewed email correspondence between JLN and BJP re: deposition case law; reviewed correspondence between JLN's assistant and JGB re: hours; discussed depositions with case team; reviewed order denying Klein's page extension request; emailed with case team re: same.	SCB	\$225	\$495
8/18/2010	0.1	Email JLN re: research on producing plaintiffs in NY	BJP	\$270	\$27
8/19/2010	2.4	Created subpoenae for CA deponents; created notices of deposition for other witnesses; emailed with JLN and BJP re: same; emailed with named-plaintiffs re: dep scheduling; met with JLN to discuss discovery	SCB	\$225	\$540
8/19/2010	0.2	Edit subpoena	BJP	\$270	\$54
8/20/2010	1.1	Read MSJ Reply to Cross-Motion	BJP	\$270	\$297
8/20/2010	2.3	Review discovery production and responses	JGB	\$690	\$1,587
8/20/2010	2.1	Emailed with BJP re: deposition dates; reviewed schedule conflicts; skimmed through CMSJ reply brief; discussed with BJP and JGB briefly; emailed with Plaintiffs and case team re: scheduling of deps.	SCB	\$225	\$473
8/20/2010	1.5	Research need to produce plaintiffs in NY for depositions; email JGB with thoughts	BJP	\$270	\$405
8/20/2010	0.4	Reviewed letter from Def. Counsel re: her refusal to provide outstanding discovery & move forward with depositions; drafted list of bullet points summarizing same	JLN	\$520	\$208
8/20/2010	0.1	Reviewed letter from BK re reply to deposition dates	JLN	\$520	\$52
8/20/2010	0.8	Reviewed Reply Affirmation of Bari R. Klein in further support of cross motion to dismiss	JLN	\$520	\$416

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/20/2010	2.2	Reviewed letter from defense counsel responding to my Aug. 17 letter; researched case law cited by defense counsel re: out-of-state witnesses & locale for holding depositions	JLN	\$520	\$1,144
8/20/2010	0.2	Sort case emails	BJP	\$270	\$54
8/20/2010	0.1	Emails with SCB re: deposition dates	BJP	\$270	\$27
8/22/2010	0.4	Read through CMSJ Reply brief; called Sandra Burga.	SCB	\$225	\$90
8/23/2010	0.5	Read Aug 20 letter from O/C, research cited case law, take notes for response	BJP	\$270	\$135
8/23/2010	1.1	Emailed with lead plaintiffs re: deposition dates; read through letter from Klein and emailed case team re: same; discussed letter and next steps with BJP.	SCB	\$225	\$248
8/24/2010	0.3	Emailed named-plaintiffs re: deposition dates; emailed with JLN re: deposition dates.	SCB	\$225	\$68
8/24/2010	0.1	Edit letter to O/C re: last known addresses	BJP	\$270	\$27
8/25/2010	3.7	Edited letter to Klein; emailed with case team re: same; faxed O/C letter; saved discovery documents in PA; emailed with Bruno; met with Bruno to prepare for deposition; left message for Burga; spoke to Burga re: dep scheduling; emailed BJP re: same.	SCB	\$225	\$833
8/25/2010	2.2	Deposition prep: print materials, email with JLN, review materials for prep session; prep session with Bruno and SCB	BJP	\$270	\$594
8/25/2010	0.8	Further correspondence with defense counsel re: scheduling of depositions and production of other defense witnesses	JLN	\$520	\$416

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/25/2010	2.3	Responded to defense counsel's Aug. 20 letter re: outstanding discovery and depositions of non-parties A. Valesquez & M. LePage, and dep. location of Robert/Jill Vandor (NYC v. Mass), and demand for affidavits re: pregnancy of K.Malak	JLN	\$520	\$1,196
8/25/2010	0.3	Letter to BK re deposition dates	JLN	\$520	\$156
8/25/2010	0.2	Review JLN's letter to BK; discuss with SCB	BJP	\$270	\$54
8/26/2010	1.9	Monthly tune-up; updated sum docs; emailed with class members; organized PA; reviewed letter from Klein; emailed with Lead Plaintiffs.	SCB	\$225	\$428
8/26/2010	0.2	Reviewed defense counsel's letter in response to Aug. 25 letter from plaintiff	JLN	\$520	\$104
8/26/2010	0.1	Reviewed Reply letter from BK re: deposition dates	JLN	\$520	\$52
8/26/2010	0.1	Sort case emails	BJP	\$270	\$27
8/26/2010	0.2	Email SAC to Bruno with instructions on what to focus on	BJP	\$270	\$54
8/27/2010	0.4	Emailed with class members; reviewed emails from JLN to determine next steps; read through letter from O/C to prep response.	SCB	\$225	\$90
8/30/2010	0.4	Reviewed Affirmation of Bari R. Klein in Opposition to Brad Berkowitz' Motion to Intervene in Opposition Motion to Intervene Pursuant to Rule 24 of the Federal Rules of Civil Procedure	JLN	\$520	\$208
8/30/2010	1.1	T/c w/Dana Bii (IJL client ? Delaware) re: her bad experiences w/IJL & their fraudulent sales tactics, & IJL's concealment of call center & no refund policy	JLN	\$520	\$572
9/1/2010	1.4	Reviewed Info Call Script; took notes re: same for use in upcoming IJL deps.	JLN	\$520	\$728

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/3/2010	0.2	Reviewed correspondence to plaintiff's re failure to respond to dep date	JLN	\$520	\$104
9/3/2010	0.1	Reviewed defense counsel's follow-up letter to prior Aug. 20 correspondence	JLN	\$520	\$52
9/7/2010	0.2	Discuss reply brief with SCB, email JLN	BJP	\$310	\$62
9/7/2010	2.6	Review entire discovery plan; discuss with case team; e-mail to co-counsel	JGB	\$690	\$1,794
9/7/2010	3.3	Emailed with class members; emailed with lead-plaintiffs re: deposition dates; emailed with MJN re: deposition expenses; edited letter to Klein; emailed with case team re: same and next steps; drafted subpoena document requests; emailed with case team re: Rule 24 reply brief.	SCB	\$240	\$792
9/7/2010	2.7	Sort case emails, read letter from BK, update sum doc with notes, update case diary for off-week, read opposition to Berkowitz motion to intervene (research some case law, take notes for reply), review JLN's reply letter and talk with SCB	BJP	\$310	\$837
9/8/2010	0.3	Read emails re: discovery from Klein and case team; discuss how to proceed with SCB re: same	BJP	\$310	\$93
9/8/2010	5.8	Searched for flights for named-plaintiffs' depositions; emailed with MJN re: same; created expense reports; read through Rule 24 opposition brief; emailed with case team re: response to Klein's email; emailed O/C re: Malak doctor's note and Bruno dates.	SCB	\$240	\$1,392
9/8/2010	0.2	Letter to BK re September deposition dates	JLN	\$520	\$104
9/8/2010	1.8	Drafted letter responding to defense counsel's Aug. 26 & September 3 letters, attempting to set record straight	JLN	\$520	\$936
9/8/2010	0.1	Case team emails re: discovery	BJP	\$310	\$31
9/9/2010	0.4	Edit subpoenas for Dolan and McGinty, and supplement Rider	BJP	\$310	\$124

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/9/2010	6.5	Write R24 Reply	BJP	\$310	\$2,015
9/9/2010	4.2	Created rider for information subpoenas for Dolan and McGinty; called MFI re: service; created dep subpoenas for Dolan and McGinty; sorted emails; discussed Rule 24 reply with BJP; read through all emails in inbox to determine next steps.	SCB	\$240	\$1,008
9/10/2010	0.8	Review discovery issues and follow up with co-counsel	JGB	\$690	\$552
9/10/2010	0.2	Discuss responding to BK's discovery-related communications with SCB	BJP	\$310	\$62
9/10/2010	3.8	Prepared subpoenas for service; discussed next steps with BJP; sorted emails; emailed class members; emailed with case team re: deposition dates; emailed Klein re: same; read through correspondence to determine how to serve defendants and affiliated parties with proper notice for depositions; emailed with case team re: same.	SCB	\$240	\$912
9/11/2010	3.6	Drafted outline of possible questions/topics that could be covered during deposition of James Tortora	JLN	\$520	\$1,872
9/11/2010	3.8	Compiled documents that could be used in deposition of James Tortora; created bound volume of same	JLN	\$520	\$1,976
9/12/2010	0.1	Emailed O/C again re: deposition dates.	SCB	\$240	\$24
9/12/2010	3.7	Drafted mock deposition outline of possible questions/topics that could be covered during deposition of Christine Rodriguez	JLN	\$520	\$1,924
9/12/2010	4.1	Assembled all possible documents that could be used in deposition of Christine Rodriguez; created bound volume of same	JLN	\$520	\$2,132
9/13/2010	0.3	Prepare deposition memo for Tortora	BJP	\$310	\$93

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/13/2010	0.2	Read and sort case emails	BJP	\$310	\$62
9/13/2010	4.9	Read through email from Klein; emailed with case team re: same; emailed named-plaintiffs whose depositions have been scheduled to confirm their availability; booked Tortora's flight and hotel for deposition; called class members (Dana Bijj, Missy Downey, and Beth Starling) re: IJL experience; emailed with case team re: new class members and Rule 30(b)(6) notice; created Rule 30(b)(6) notice; emailed with Klein re: Burga's availability; edited Rule 24 reply brief.	SCB	\$240	\$1,176
9/13/2010	4.2	Assembled all possible documents that could be used in deposition of Janeen Cameron; bound volume of same	JLN	\$520	\$2,184
9/13/2010	4.25	Drafted mock deposition outline of possible questions/topics that could be covered during deposition of Janeen Cameron	JLN	\$520	\$2,210
9/13/2010	1.8	Work on Reply for R24	BJP	\$310	\$558
9/13/2010	0.1	Email with SCB re: deposition dates	BJP	\$310	\$31
9/14/2010	1.4	Discuss discovery, class cert, and other matters with outside counsel	JGB	\$690	\$966
9/14/2010	0.1	Emails with SCB re: issues email to JGB	BJP	\$310	\$31
9/14/2010	4.8	Emailed with O/C re: Burga deposition; emailed Bruno; emailed with case team re: deposition scheduling; edited Rule 30(b)(6) deposition notice; delivered Rule 30b6 motion to O/C's offices; talked on phone with class member; drafted engagement letter and sent to class member; emailed with BJP re: Rule 24 brief; edited letter to court; prepared exhibits for letter to court and faxed to O/C and Judge Fox; emailed with Tortora re: deposition.	SCB	\$240	\$1,152
9/14/2010	0.1	Discuss email to BK with SCB, read SCB's email to BK	BJP	\$310	\$31

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/14/2010	3.5	Drafted mock deposition outline of possible issues that might come up during deposition of Sandra Burga	JLN	\$520	\$1,820
9/14/2010	0.5	Read SCB email to JLN; read and supplement 30(b)(6) notice; miscellaneous emails with SCB re: case	BJP	\$310	\$155
9/15/2010	0.4	Complete final edits to R24 reply	BJP	\$310	\$124
9/15/2010	5.4	Searched for flights and hotel for Cameron deposition; spoke to Cameron on phone and emailed with her re: same; emailed with MJN re: expenses; booked flights and hotel; edited letter to Court re: compelling discovery; faxed letter to Court and O/C; edited Rule 24 Reply brief; put together exhibits for Rule 24 Reply brief; filed Rule 24 reply brief.	SCB	\$240	\$1,296
9/15/2010	0.5	Edit letter to compel discovery, discuss with SCB	BJP	\$310	\$155
9/15/2010	0.1	Emails with case team re: meeting	BJP	\$310	\$31
9/16/2010	5.2	Prepared for Tortora deposition; read through letter to court from Klein re: motion to compel; reviewed and edited motion to compel reply letter; put together exhibits for same; faxed reply letter to Court and delivered hard copy of exhibits; read through email from Karen McBride and forwarded to JLN and BJP for input.	SCB	\$240	\$1,248
9/16/2010	0.3	Case emails with JLN and SCB	BJP	\$310	\$93
9/16/2010	0.9	Read letter to judge from BK; edit JLN's reply letter with SCB	BJP	\$310	\$279
9/16/2010	0.9	Follow-up meeting with James Tortora prior to his dep. today	JLN	\$520	\$468
9/16/2010	2.75	Met w/James Tortora to prepare him for tomorrow's deposition	JLN	\$520	\$1,430

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/16/2010	0.2	Reviewed letter from BK to Judge in opposition to our 9/15/10 letter	JLN	\$520	\$104
9/17/2010	7.3	Deposition of James Tortora	BJP	\$310	\$2,263
9/17/2010	3.1	Met w/James Tortora following deposition; discussed same & next steps for moving forward.	JLN	\$520	\$1,612
9/17/2010	6	Defended James Tortora at his deposition today	JLN	\$520	\$3,120
9/17/2010	8.4	Printed out Tortora docs; met with Tortora, JLN, and BJP at hotel; went to O/C's office for deposition; deposition of Tortora; sorted emails; emailed with Cameron re: flight and hotel information; called Expedia re: same.	SCB	\$240	\$2,016
9/18/2010	0.3	Read through emails from JLN re: deposition schedule and next steps.	SCB	\$240	\$72
9/18/2010	2.1	Started dep. outline for Irene Lacota (former IJL president)	JLN	\$520	\$1,092
9/19/2010	5.75	Cont'd working on dep. outline for Irene Lacota	JLN	\$520	\$2,990
9/19/2010	0.3	Sent emails to Cameron re: dep schedule; emailed with JLN re: same.	SCB	\$240	\$72
9/20/2010	0.5	Case meeting with JGB/SCB; read SCB email to JLN	BJP	\$310	\$155
9/20/2010	4.4	Finished dep. outline for Irene Lacota	JLN	\$520	\$2,288
9/20/2010	2.2	Meeting with Janeen Cameron to prepare her for her deposition	JLN	\$520	\$1,144
9/20/2010	0.2	E-mail exchange with B.Klein and Malak Hamwi (clerk for Judge Fox) regarding scheduling telephonic conference	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/20/2010	3.3	Discussed expenses with MJN; entered expenses in PA; drafted letter to Klein re: FL call center; drafted letter to Klein re: deposition scheduling; emailed with JLN re: Cameron deposition; emailed Cameron re: Tuesday's schedule; emailed Burga re: dep; emailed Bruno re: rescheduling of dep; read through correspondence between court and counsel re: phone conference with Fox.	SCB	\$240	\$792
9/21/2010	5.5	Defend/assist with Janeen Cameron's deposition	BJP	\$310	\$1,705
9/21/2010	7.3	Read through emails from JLN; printed copies of discovery responses, motion to compel letter for JLN; met with Cameron; edited letters and faxed to O/C; walked to and from O/C's office; deposition of Cameron; discussed dep and addressing BJP bar admission with case team.	SCB	\$240	\$1,752
9/21/2010	0.2	Read and sort case emails	BJP	\$310	\$62
9/21/2010	1.8	Deposition prep for Janeen Cameron	BJP	\$310	\$558
9/21/2010	0.6	Draft letter memorializing deposition schedules for Florida witnesses, California witnesses, & Jennifer Foster, Nancy Kirsch, Daniel Dolan & Andrea McGinty, the Vandors & Lisa Bruno	JLN	\$520	\$312
9/21/2010	0.2	Telephone Conference held on 9/21/2010 re: Deposition of the Vandors will occur in New York	JLN	\$520	\$104
9/21/2010	4.5	Deposition of Janeen Cameron	JLN	\$520	\$2,340
9/21/2010	0.9	Met w/Janeen Cameron following deposition; discussed her testimony & next steps for moving forward	JLN	\$520	\$468
9/22/2010	0.4	Research subpoena-ing Dolan	BJP	\$310	\$124
9/22/2010	0.4	General deposition prep: write out topics/questions covered by BK to use in prepping future witnesses	BJP	\$310	\$124

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/22/2010	1.1	Write letter to judge Fox re: error in handling deposition; discuss edits with JGB, save in PA, email SCB to fax letter to Fox/BK	BJP	\$310	\$341
9/22/2010	2.9	Edited letter to Fox re: BJP bar admission; faxed letter to Court; sent courtesy copies of subpoenas to O/C; reviewed letter sent by Klein to court re: confidential informants.	SCB	\$240	\$696
9/22/2010	0.2	Read letter from defense counsel seeking an order to compel plaintiffs to pay counsel's travel expenses to Florida (for Angel Valesquez & Michelle LePage) & California witnesses (Andrea McGinty & Daniel Dolan)	JLN	\$520	\$104
9/22/2010	1.4	Reviewed IJL's guidelines re: Old Info Calls & Old Web Leads; took notes re: same	JLN	\$520	\$728
9/22/2010	0.6	Reviewed IJL's Info Call Script Guidelines; took notes re same for use in upcoming IJL deps.	JLN	\$520	\$312
9/23/2010	3.9	Reviewed emails from JLN; emailed lead plaintiffs re: depositions; reviewed updated deposition schedules; emailed with MJN re: JLN expenses; put expenses in PA.	SCB	\$240	\$936
9/23/2010	0.1	Emails re: Rodriguez's defending attorney	BJP	\$310	\$31
9/23/2010	2.3	Review discovery process up to date; review potential deposition issues for upcoming deps	JGB	\$690	\$1,587
9/23/2010	2.7	Prep for prep meeting with Rodriguez, conduct dep prep with Rodriguez	BJP	\$310	\$837
9/23/2010	0.4	Reviewed IJL's Wonderlic Personnel Test for prospective employees; took notes re same	JLN	\$520	\$208
9/23/2010	0.3	E-mail exchanges w/defense counsel re: deposition dates for Valesquez, LePage, Panucci, the Vandors, K.McBride & C.Rodriguez	JLN	\$520	\$156
9/23/2010	2.75	Meeting with Christine Rodriguez for deposition prep	JLN	\$520	\$1,430

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/23/2010	0.9	Reviewed IJL's guidelines for building credibility with prospective clients; took notes re same	JLN	\$520	\$468
9/23/2010	1.2	Reviewed IJL's guidelines re: finding the first 150-200 clients; took notes re: same	JLN	\$520	\$624
9/24/2010	6.5	Prep with CR, attend deposition of CR	BJP	\$310	\$2,015
9/24/2010	6.5	Prep for deposition of Christine Rodriguez; deposition of Christine Rodriguez.	SCB	\$240	\$1,560
9/24/2010	0.5	Assembled all possible documents that could be used in deposition of Sandra Burga; created bound volume of same	JLN	\$520	\$260
9/24/2010	5	Deposition of Christine Rodriguez	JLN	\$520	\$2,600
9/24/2010	1.7	Drafted letter to Court respond to defense counsel's request for travel expenses to Florida & California	JLN	\$520	\$884
9/24/2010	0.7	Met w/Christine Rodriguez following deposition; discussed her testimony & next steps for moving forward	JLN	\$520	\$364
9/24/2010	0.2	Reviewed endorsed letter to Judge Fox seeking costs for depositions of Dolan & McGinty	JLN	\$520	\$104
9/25/2010	4.9	Started preparing deposition outline for J. Novotny in Fla.	JLN	\$520	\$2,548
9/25/2010	3.75	Continued working on dep. outline for J. Novotny	JLN	\$520	\$1,950
9/26/2010	3.4	Reviewed IJL's Director Manual & took notes re: same for upcoming depositions of IJL' employees	JLN	\$520	\$1,768
9/26/2010	2.6	Reviewed IJL's Director Manual Training Video, played multiple times & took notes re: same	JLN	\$520	\$1,352
9/26/2010	6.4	Reviewed defendants' additional R.26 disclosures (procedures & guidelines for IJL franchises); highlighted and took notes re same: flagged docs for use as exhibits in upcoming IJL depositions	JLN	\$520	\$3,328

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/27/2010	1.1	Emailed with JLN re: Klein letter; reviewed Klein letter; reviewed court-filing re: scheduling conference; emailed with case team re: same; reviewed court-filing re: depositions; emailed process server for update on service of subpoenas on McGinty and Dolan.	SCB	\$240	\$264
9/27/2010	2.4	Review discovery issues; touch base with co-counsel re: deps; touch base with case team; review earlier class cert research	JGB	\$690	\$1,656
9/27/2010	0.1	Reviewed endorsed letter to Judge Kevin N. Fox from Bari R. Klein dated 9/27/10 re: conference being re-scheduled for October 8, 2010 at 2:00 pm	JLN	\$520	\$52
9/27/2010	4.6	Reviewed defendants additional Rule 26 disclosures; highlighted and took notes re: same for use in upcoming deps of IJL employees	JLN	\$520	\$2,392
9/27/2010	2.4	Finalized dep. outline for J. Novotny	JLN	\$520	\$1,248
9/28/2010	3.2	Met with JLN to discuss next steps; emailed with JLN re: same; reviewed correspondence to the Court from both parties to determine next steps; emailed with a potential class member; reviewed emails in Thunderbird to prepare for new discovery demands.	SCB	\$240	\$768
9/28/2010	7.2	Started dep. outline for M. Brown (IJL Prez.)	JLN	\$520	\$3,744
9/28/2010	2.8	Reviewed IJL's Coordinator Manual & took notes re: same	JLN	\$520	\$1,456
9/28/2010	1.9	Reviewed IJL Coordinator's Manual Training Video, played multiple times; took notes re: same for use at upcoming deps	JLN	\$520	\$988

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/29/2010	6.6	Spoke to JLN on phone re: next steps; discussed same with BJP; emailed Malak re: deposition; emailed Klein re: Malak deposition; emailed Klein re: availability for status conference; drafted letters to Klein re: confidential informants and depositions; drafted letter to Court re: status conference; drafted second sets of interrogatories and document demands; emailed JLN re: same.	SCB	\$240	\$1,584
9/29/2010	0.2	Edit SCB letters	BJP	\$310	\$62
9/29/2010	0.1	Sort case emails	BJP	\$310	\$31
9/29/2010	2	Travel to Fort Lauderdale for 9-30-10 depositions of Angel Valazquez and Michele LePage and 10-1-10 deposition of Julie Novotny (4.0)	JLN	\$520	\$1,040
9/29/2010	0.1	Reviewed cover letter & dep. notices for K. Basner, P.Martino and Anna Anderson	JLN	\$520	\$52
9/29/2010	2.75	Mtg. w/ M. LePage re: issues likely to be covered at dep.	JLN	\$520	\$1,430
9/29/2010	3.2	Mtg w/Angel Velasquez re: dep. & issues likely to be covered	JLN	\$520	\$1,664
9/29/2010	1.6	Reviewed defendants Supplemental Disclosure dated Sept. 28, 2010 re: Inside Sales Representative procedures/guidelines	JLN	\$520	\$832
9/30/2010	1.6	Edit/update summary document	BJP	\$310	\$496
9/30/2010	1.3	Monthly tune-up; updated case diary and summary document; emailed class members; emailed Burga re: deposition confirmation; updated dates in PA; updated contacts; read through correspondence from JLN re: next steps; emailed with case team re: same.	SCB	\$240	\$312
9/30/2010	1.6	Began review of defendants Second Supplemental Rule 26 disclosure (FDU materials relating to duties & responsibilities of IJL outside sales representatives); took notes re same	JLN	\$520	\$832

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/30/2010	3.8	Finished review of defendants Second Supplemental Rule 26 disclosure (FDU materials relating to outside sales representatives); took notes re same and created bullet point summary of essential points for upcoming dep of J. Novotny	JLN	\$520	\$1,976
9/30/2010	0.3	Prepared letter to Judge Fox re: request conference scheduled for 10/20/10 be rescheduled	JLN	\$520	\$156
9/30/2010	5.1	Depositions of M. LePage & A. Valesquez	JLN	\$520	\$2,652
10/1/2010	0.3	Edit FL interrogatories and doc demands	BJP	\$310	\$93
10/1/2010	2.5	Traveled back from Florida to New York (5.0)	JLN	\$520	\$1,300
10/1/2010	5.4	Deposition of J. Novotny	JLN	\$520	\$2,808
10/1/2010	1.6	Emailed with class members following monthly update; emailed Burga contact info to JLN; emailed Bruno re: deposition date; reviewed Defendants' supplemental production and saved in PA; completed Plaintiffs' second demand for documents and interrogatories; emailed and mailed to O/C.	SCB	\$240	\$384
10/2/2010	0.4	Reviewed Letter from Klein and Affidavit of Julie Novotny employee to IJL	JLN	\$520	\$208
10/2/2010	6.4	Continued working on dep. outline of M. Brown	JLN	\$520	\$3,328
10/2/2010	0.1	Read through email from JLN.	SCB	\$240	\$24
10/3/2010	8.1	Finished prep of outline for dep. of M.Brown	JLN	\$520	\$4,212
10/3/2010	1.3	Reviewed IJL's training guidelines for conducting interview with prospective clients; took notes re: same	JLN	\$520	\$676
10/3/2010	0.4	Read through emails from JLN and correspondence between JGB and JLN; spoke to JLN on the phone to discuss next steps.	SCB	\$240	\$96

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/4/2010	2.6	Research fraudulent inducement/reliance issue; begin writing memo	BJP	\$310	\$806
10/4/2010	0.2	Discuss next steps with JGB/SCB	BJP	\$310	\$62
10/4/2010	5	Travel to Palm Desert, California for 10-5-10 deposition of Melissa Brown (10.0)	JLN	\$520	\$2,600
10/4/2010	3.9	Read through emails from JLN; determined next steps; drafted letter to O/C re: JLN responses; met with JGB and BJP to discuss next steps; read through emails between JGB and JLN; discussed letter to O/C with BJP; sent letter to O/C; emailed Burga responses for deposition prep; emailed JLN docs; spoke to Beth Starling.	SCB	\$240	\$936
10/4/2010	0.2	Calls/emails with SCB re: letter to BK	BJP	\$310	\$62
10/4/2010	0.3	Read JLN/JGB emails, sort emails, discuss with SCB	BJP	\$310	\$93
10/5/2010	2.7	Emailed with JLN re: letter to O/C; searched records for recent contact information of former employees; resent September 29, 2010 letters to O/C; reviewed Ds' supplemental production.	SCB	\$240	\$648
10/5/2010	5.3	Research/write memo on fraudulent inducement claim	BJP	\$310	\$1,643
10/5/2010	6.9	Took dep. of M. Brown	JLN	\$520	\$3,588
10/5/2010	0.2	Read and sort emails	BJP	\$310	\$62
10/6/2010	2.1	Spoke to MFI several times re: service of subpoenas; emailed with JLN re: Burga and former employees' addresses; emailed with O/C re: letters about former employees; drafted letter to O/C re: last known addresses; sent same to O/C.	SCB	\$240	\$504
10/6/2010	2.8	Research/write memo on fraudulent inducement class certification	BJP	\$310	\$868

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/6/2010	0.4	Discuss last known addresses with SCB, edit letter to BK re: same	BJP	\$310	\$124
10/6/2010	4.8	Started drafting dep. outline for Nancy Epstein (former IJL VP)	JLN	\$520	\$2,496
10/6/2010	1.5	Travel to San Diego, California for deposition of Irene LaCota on 10-7-10 (3.0)	JLN	\$520	\$780
10/7/2010	4.1	Write/edit memo re: fraudulent inducement class certification	BJP	\$310	\$1,271
10/7/2010	6.2	Took deposition of Irene LaCota, former Pres. of IJL	JLN	\$520	\$3,224
10/8/2010	3.75	Cont'd working on dep. outline for Nancy Epstein	JLN	\$520	\$1,950
10/8/2010	5	Travel back to NYC from San Diego (10.00)	JLN	\$520	\$2,600
10/8/2010	3.7	Drafted plaintiffs' Third set of Doc. Demands based on dep. testimony of California & Fla. IJL witnesses; e-mailed same to SAB for expedited processing	JLN	\$520	\$1,924
10/8/2010	1.9	Emailed with JLN re: discovery demands; put together third set of document demands; spoke to Beth Starling to reschedule phone call.	SCB	\$240	\$456
10/9/2010	0.3	Read through emails re: Notice of Entry and former employee; responded about Columbus Day closing.	SCB	\$240	\$72
10/10/2010	0.1	Read through email from JLN re: next steps.	SCB	\$240	\$24
10/11/2010	5.6	Took dep. of Nancy Epstein	JLN	\$520	\$2,912
10/11/2010	2.5	Travel to Bethesda, Maryland for 10-11-10 deposition of Nancy Epstein (5.0)	JLN	\$520	\$1,300
10/12/2010	4.1	Edit memo on fraudulent inducement claim, research viability of amending with CA claims	BJP	\$310	\$1,271
10/12/2010	0.2	Read and sort case emails	BJP	\$310	\$62

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/12/2010	4.9	Reviewed tasks to be completed for discovery; drafted and sent letter to Klein re: former employee; drafted and sent letter to Klein re: PJ Osgood; drafted and sent to Klein notice of dep for Osgood; created Notice of Entry Upon Land for Florida Call Center; reviewed Federal Rules re: same; emailed with case team; skimmed through Rodriguez deposition transcript.	SCB	\$240	\$1,176
10/12/2010	0.6	Drafted Notice of Entry Upon Land for purposes of inspecting the Florida Call Center	JLN	\$520	\$312
10/12/2010	2.25	Traveled back to NYC from Bethesda (4.5)	JLN	\$520	\$1,170
10/12/2010	0.1	Reviewed letter to court seeking two additional depositions & extension of discovery deadline	JLN	\$520	\$52
10/13/2010	3.1	Case mtg with JGB/JLN/SCB; Case mtg with JLN/SCB; write letter to Fox re: discovery extension and additional depositions, input edits; read and sort case emails; print fraudulent inducement reliance cases	BJP	\$310	\$961
10/13/2010	6.8	Met with case team to discuss next steps; emailed with JLN re: subpoenas to Jones Day and Riverside; drafted subpoenas and sent to O/C; drafted amended notice of deposition for Osgood with letter and sent to O/C; drafted letter to O/C re: Dolan and McGinty addresses; reviewed and edited letter to Fox re: discovery extension and more depositions; emailed JLN re: contact info of former employees and class members; updated contacts.	SCB	\$240	\$1,632
10/13/2010	0.4	Reviewed Day & Riverside Subpoenas	JLN	\$520	\$208
10/14/2010	4.3	Research comparable 9th cir law, Stein/Fox cert decisions	BJP	\$310	\$1,333
10/15/2010	2.9	Finish draft of fraudulent inducement/reliance memo with updates re: judge's decisions and 9th circuit case law	BJP	\$310	\$899

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/15/2010	2.6	Reviewed previous demands to determine what still needs to be produced; emailed with BJP re: next steps; updated summary document.	SCB	\$240	\$624
10/18/2010	2.1	Searched for missing discovery; emailed with JLN re: Bruno deposition; created new matters inbox; sorted email folders to new matters inbox.	SCB	\$240	\$504
10/19/2010	0.6	Reviewed emails from JLN to determine next steps; sorted emails.	SCB	\$240	\$144
10/19/2010	2.7	Started drafting outline for IJL employee Jennifer Panucci	JLN	\$520	\$1,404
10/20/2010	2.7	Read through demands issued to Defendants; updated dates in PA for deadlines; verified details for status conference with Fox on Oct. 25; emailed JLN update; discussed next steps with BJP; read through letter from Klein and Novotny affidavit re: FL call center.	SCB	\$240	\$648
10/20/2010	2.9	Continued working on deposition outline for Jennifer Panucci	JLN	\$520	\$1,508
10/21/2010	5.5	Write letter to Fox to compel discovery; emails with JLN/SCB	BJP	\$310	\$1,705
10/21/2010	1.7	Emailed with BJP and JLN re: motion to compel; attempted calling/emailing MFI several times re: service of subpoenas; emailed with/spoke to SRG re: MFI; read through email from class member.	SCB	\$240	\$408
10/21/2010	0.1	Read letter from Lawrence Zager, D.D.S., re: P.J. Osgood's alleged inability to testify at a deposition	JLN	\$520	\$52
10/21/2010	4.2	Finished dep. outline for Jennifer Panucci	JLN	\$520	\$2,184
10/22/2010	1.2	Read through emails from JLN re: next steps; emailed with BJP re: same; read through emails from Klein; spoke to SRG re: subpoenas; forwarded same to JLN.	SCB	\$240	\$288

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/22/2010	0.4	Read emails and attachments re: Palm Beach Defendants	BJP	\$310	\$124
10/22/2010	1.5	Search for documents and correspondence for JLN; email JLN with summary	BJP	\$310	\$465
10/23/2010	0.3	Emailed with Karen Malak and JLN re: Malak deposition.	SCB	\$240	\$72
10/23/2010	1.8	Reviewed IJL's training materials re: RDA's (Revenue Development Activities); took notes re: same	JLN	\$520	\$936
10/24/2010	0.1	Read through email from JLN re: motion to compel and email from Malak re: deposition.	SCB	\$240	\$24
10/25/2010	4.4	Edited letter to compel to court; put together exhibits; discussed same with Nicole; emailed with case team; called court re: over size fax; sent fax to court; reviewed letter to court from Klein re: southern CA costs; status conference with the Court.	SCB	\$240	\$1,056
10/25/2010	1.3	Call with Judge Fox re: discovery matters; post-call discussion with SCB and JLN	BJP	\$310	\$403
10/25/2010	0.3	Discuss conference call with SCB	BJP	\$310	\$93
10/25/2010	0.1	Review letter to court from BK	BJP	\$310	\$31
10/25/2010	2.1	Drafted letter opposing defendants' request for costs for S. Burga cancellation of deposition	JLN	\$520	\$1,092
10/25/2010	3.4	Drafted letter motion to compel re: defendants' refusal to allow inspection of call center & defendants refusal to produce PJ Osgood (Chicago owner) for a deposition	JLN	\$520	\$1,768
10/25/2010	0.4	Read defense counsel's letter seeking costs for cancellation of Burga Dep.; drafted bullet point summary of points to respond to same	JLN	\$520	\$208
10/25/2010	0.4	Telephone Conference held on 10/25/2010 MJ Fox	JLN	\$520	\$208

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/26/2010	0.2	Review/edit letter to Fox re: BK's application for costs	BJP	\$310	\$62
10/26/2010	1.9	Read through emails from case team re: service of Dolans; edited letter to Fox re: Burga costs; sent letter to court with exhibits; discussed same with BJP; reviewed subpoenas served upon Dr. Holt and the Dolans; send same to O/C; emailed with case team re: Malak.	SCB	\$240	\$456
10/26/2010	0.1	Reviewed MJ Fox's Order granting permission to enter Fla. Call Center & extending discovery to Dec. 6, 2010.	JLN	\$520	\$52
10/26/2010	4.1	Compiled documents that could be used in deposition of Karen Malak; created bullet point summary of same	JLN	\$520	\$2,132
10/26/2010	0.6	Letter to Court responding to Burga Costs	JLN	\$520	\$312
10/26/2010	2.5	Travel to Chicago for 10-27-10 deposition to Karen Malak (5.0)	JLN	\$520	\$1,300
10/26/2010	4.2	Drafted mock dep. outline of all possible questions/topics that could be covered during deposition of Karen Malak	JLN	\$520	\$2,184
10/26/2010	2.6	Met w/Karen Malek for dep. prep	JLN	\$520	\$1,352
10/27/2010	0.1	Emails re: settlement	BJP	\$310	\$31
10/27/2010	2.9	Called court reporter re: Cameron and Tortora transcripts; read through Cameron transcript; emailed with case team re: potential settlement conference; read through email from class member.	SCB	\$240	\$696
10/27/2010	4.5	Defended Karen Malek at her dep	JLN	\$520	\$2,340
10/27/2010	0.9	Met w/Karen Malak following her dep. & discussed same & next steps in lawsuit.	JLN	\$520	\$468

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/28/2010	3.4	Sorted emails; edited letter to court re: Dolan deposition dates; emailed case team re: same; sent letter to court re: same; read through emails from JLN re: supplemental demands for IJL relating to Jones Day and Riverside.	SCB	\$240	\$816
10/28/2010	0.2	Read defense counsel's response to plaintiff's opp. to application for costs due to S.Burga non-appearance at dep. scheduled for Oct. 8	JLN	\$520	\$104
10/28/2010	1.9	Reviewed IJL's Membership Consultant agreement; took notes re: same	JLN	\$520	\$988
10/28/2010	0.2	Reviewed letter from Klein to Judge re Burga Costs for failure to show at Dep, and Plaintiff's Third Request for Production of Documents	JLN	\$520	\$104
10/28/2010	1.4	Reviewed IJL's guidelines re: flexing parameters; took notes re same	JLN	\$520	\$728
10/28/2010	3	Traveled back from Chicago to NYC (6.0)	JLN	\$520	\$1,560
10/29/2010	0.3	Read/sort/respond to emails re: discovery issues	BJP	\$310	\$93
10/29/2010	0.6	Write letter to Fox re: settlement conference	BJP	\$310	\$186
10/29/2010	0.3	Found documents responsive to JLN's requests for preparation for deposition; emailed with JLN.	SCB	\$240	\$72
10/29/2010	0.5	Travel back from New Jersey to New York (1.0)	JLN	\$520	\$260
10/29/2010	1.1	Prepared letter to Magistrate Fox dated requesting permission to conduct a series of three depositions in California on December 15-17, 2010.	JLN	\$520	\$572
10/29/2010	0.5	Travel to New Jersey for deposition of Jennifer Panucci (1.0)	JLN	\$520	\$260
10/29/2010	6	Took dep. of Jennifer Panucci	JLN	\$520	\$3,120
10/29/2010	1.6	Monthly tune-up; emailed with class members.	SCB	\$240	\$384
10/30/2010	4.2	Started drafting outline for R. Vandor's dep	JLN	\$520	\$2,184

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/30/2010	5.6	Started working on dep. outline for Jill Vandor	JLN	\$520	\$2,912
10/31/2010	3.9	Assembled all documents that could be used in deposition of Lisa Bruno; created booklet re same	JLN	\$520	\$2,028
10/31/2010	6.2	Continued working on dep. outline for Jill Vandor	JLN	\$520	\$3,224
10/31/2010	0.2	Read through emails from JLN and responded.	SCB	\$240	\$48
11/1/2010	0.4	Review/edit letters to Fox and BK	BJP	\$310	\$124
11/1/2010	2.4	Reviewed IJL NY Franchise Agreement for use at tomorrow's dep of J. Vandor; took notes re: same	JLN	\$520	\$1,248
11/1/2010	1.2	Reviewed NY State AOD signed by Harry & Sally and affidavit of Robert Vandor for use at Vandors' upcoming depositions	JLN	\$520	\$624
11/1/2010	0.3	Letter to BK advising of telephone numbers	JLN	\$520	\$156
11/1/2010	1.9	Finished outline for R. Vandor	JLN	\$520	\$988
11/1/2010	7.6	Continued working on deposition outline for Jill Vandor	JLN	\$520	\$3,952
11/1/2010	0.4	Letter to Dr Holt withdrawing subpoena	JLN	\$520	\$208
11/1/2010	0.4	Reviewed IJL's New York Magazine Ads; took notes re: same for use at Vandor deps.	JLN	\$520	\$208
11/1/2010	0.9	Reviewed Assurance of Discontinuance Pursuant to Executive Law Section 63(15) filed in Buffalo, Affidavit of Vandor with Exhibits	JLN	\$520	\$468
11/1/2010	5.3	Assisted in drafting and editing letter to court re: motion for costs for CA deps; assisted in drafting and editing letter to Klein re: Confidential Informants' addresses; emailed with JLN re: depositions of Vandors; emailed with JLN re: subpoenas and docs needed for dep prep; searched through briefs to find Vandor affidavits and accompanying exhibits.	SCB	\$240	\$1,272

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/2/2010	3.6	Read through deposition transcript of Melissa Brown; emailed with JLN re: deposition of Vandors.	SCB	\$240	\$864
11/2/2010	0.1	Reviewed subpoena served by defense counsel on Cami Craig for deposition in Atlanta on Nov. 22, 2010	JLN	\$520	\$52
11/2/2010	5.2	Took deposition of Jill Vandor	JLN	\$520	\$2,704
11/2/2010	0.1	Reviewed letter from JB to Klein re deposition scheduling	JLN	\$520	\$52
11/2/2010	1.5	Reviewed Bruno-Response to Doc Demand, Interrogatories & Requests for Admissions for upcoming depo	JLN	\$520	\$780
11/2/2010	0.2	Drafted letter disclosing Lisa Wade McCormick (investigative reporter w/consumer affairs.com)	JLN	\$520	\$104
11/2/2010	0.4	Prepared Letter to Judge Fox re: Request to adjourn the 11/15/10 settlement conference	JLN	\$520	\$208
11/2/2010	3.6	Drafted outline of possible questions/topics that could be covered during deposition of Lisa Bruno	JLN	\$520	\$1,872
11/3/2010	2.2	Emailed with JLN re: fourth set of doc demands; emailed Bruno re: deposition; sent JLN necessary docs for Bruno deposition prep; emailed with class members to set up phone calls.	SCB	\$240	\$528
11/3/2010	2.6	Meeting with Lisa Bruno for deposition prep	JLN	\$520	\$1,352
11/3/2010	5.1	Took Deposition of Robert Vandor	JLN	\$520	\$2,652
11/3/2010	0.3	Read/sort case emails; email with JLN and SCB for update	BJP	\$310	\$93
11/4/2010	4.6	Review discovery and deposition issues; follow up with co-counsel; review discovery filings; review and update sum doc	JGB	\$690	\$3,174
11/4/2010	0.1	Reviewed defendants' subpoena for deposition of plaintiff's counsel on November 10, 2010	JLN	\$520	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/4/2010	5.5	Deposition of Lisa Bruno	JLN	\$520	\$2,860
11/4/2010	0.75	Met w/L.Bruno following deposition; discussed same & next steps for moving forward	JLN	\$520	\$390
11/5/2010	5.7	Spoke to class member; drafted engagement letter; called another class member; emailed with JLN re: fourth set of document demands; emailed him with necessary docs; drafted letter to Klein re: Martino; emailed with JLN re: same; prepared fourth set of doc demands; sent to O/C.	SCB	\$240	\$1,368
11/5/2010	3.25	Started drafting plaintiff's Fourth Request for Production of Documents	JLN	\$520	\$1,690
11/6/2010	4.2	Reviewed deposition notes from Vandor dep for creation of additional discovery demands; finished drafting plaintiff's Fourth Request for Production of Documents	JLN	\$520	\$2,184
11/6/2010	0.3	Drafted subpoena to compel appearance of P.J. Osgood (Chicago IJL) to appear for deposition in Chicago	JLN	\$520	\$156
11/7/2010	1.4	T/c w/Yollanda London Osborne re: pros/cons of being lead plaintiff, responsibilities & duties of lead plaintiff, willingness to provide affidavit for SJ motion	JLN	\$520	\$728
11/8/2010	2.1	Emailed with JLN re: letter to court; put together and edited letter to court; faxed to O/C and court; drafted letter to Klein re: outstanding discovery; emailed with JLN re: same.	SCB	\$240	\$504
11/8/2010	0.1	Review Letter to Fox	BJP	\$310	\$31
11/8/2010	2.1	Letter to Court responding to Burga Costs	JLN	\$520	\$1,092
11/8/2010	2.4	Researched issue re: a party's right to take depositions of opposing counsel in federal lawsuits	JLN	\$520	\$1,248

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/9/2010	0.2	Read through letter to court from JLN; read through emails.	SCB	\$240	\$48
11/9/2010	3.2	Drafted letter motion to court seeking to quash defendants' subpoena to take deposition of plaintiff's counsel (JLN) & seeking costs for necessity of application	JLN	\$520	\$1,664
11/9/2010	0.4	Reviewed defendants Fourth Supplemental Rule 26 disclosures	JLN	\$520	\$208
11/10/2010	0.7	Edited letter to Klein re: Yollanda London; compiled exhibits; emailed with case team; sent letter to Klein.	SCB	\$240	\$168
11/10/2010	0.1	Letter to defense counsel offering to produce Ms. Osbourne for a deposition	JLN	\$520	\$52
11/11/2010	0.2	Emailed with case team re: FL Call Center.	SCB	\$240	\$48
11/11/2010	0.2	E-mail exchange with B. Klein regarding Hallandale Site Inspection	JLN	\$520	\$104
11/12/2010	0.1	Reviewed Order re: Burga's costs	JLN	\$520	\$52
11/12/2010	0.2	E-mail exchange with JB regarding Hallandale Site Inspection	JLN	\$520	\$104
11/12/2010	0.8	Drafted letter to defense counsel seeking outstanding discovery prior to upcoming discovery deadline on Dec. 6, 2010.	JLN	\$520	\$416
11/12/2010	0.2	Spoke to Kathryn Polacik on the phone to set up time to speak next week.	SCB	\$240	\$48
11/13/2010	2.1	Reviewed IJL's disclosures BK 1327 though BK 1913; took notes re same	JLN	\$520	\$1,092
11/15/2010	0.2	E-mail exchange with JB regarding retaining Eric for taking pictures of Hallandale Site	JLN	\$520	\$104
11/15/2010	0.2	E-mail exchanges with Cami Craig (former IJL Sales Exec.) Re: her upcoming deposition	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/16/2010	3.7	Read through Irene LaCota deposition transcript; tried calling class member; emailed with JLN re: tasks; sorted emails.	SCB	\$240	\$888
11/17/2010	5.2	Created Osborne engagement letter; emailed with her re: same; emailed with JLN re: interrogatory verifications; drafted verifications for named-plaintiffs and emailed them re: same; reviewed order from Fox re: Burga costs; scanned in Cameron, Rodriguez and Tortora deposition transcripts; emailed with JLN re: same.	SCB	\$240	\$1,248
11/17/2010	2.4	Meeting w/C. Craig in Atlanta re: her upcoming dep & likely issues to be covered	JLN	\$520	\$1,248
11/17/2010	2.25	Travel to Atlanta for 11/18/10 deposition of Cami Craig (4.50)	JLN	\$520	\$1,170
11/18/2010	0.3	Emailed deposition transcripts to Cameron, Rodriguez and Tortora; emailed with JLN re: transcripts.	SCB	\$240	\$72
11/18/2010	7	Attended deposition of C. Craig	JLN	\$520	\$3,640
11/19/2010	0.3	Emailed with JLN re: deposition transcripts; emailed named-plaintiffs re: interrogatory verifications and deposition transcripts.	SCB	\$240	\$72
11/19/2010	3	Traveled from Atlanta back to NYC (6.0)	JLN	\$520	\$1,560
11/20/2010	2.6	Review deposition transcripts; review potential deposition questions in next deps; research JLN deposition issue	JGB	\$690	\$1,794
11/20/2010	4.5	Started drafting dep. outline for P.J. Osgood (Chicago IJL)	JLN	\$520	\$2,340
11/21/2010	2.5	Travel to Hallandale for 11/21/10 onsite inspection of It's Just Lunch (5.0)	JLN	\$520	\$1,300
11/21/2010	2.2	Inspection of IJL's Fla. Call Ctr.; Took Photos re: same w/prof. photographer	JLN	\$520	\$1,144
11/21/2010	2	Travel back from Florida to NYC (4.0)	JLN	\$520	\$1,040

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/22/2010	0.1	Emailed with JLN re: motion to compel; skimmed over emails between MJN and JGB re: invoices.	SCB	\$240	\$24
11/22/2010	5.8	Cont'd drafting dep. outline for PJ Osgood	JLN	\$520	\$3,016
11/23/2010	1.1	Review discovery progress; touch base with JLN	JGB	\$690	\$759
11/23/2010	4.2	Finished dep. outline for PJ Osgood	JLN	\$520	\$2,184
11/23/2010	0.4	Finished review of defendants' Fifth Supplemental Rule 26 disclosure; took notes re: same	JLN	\$520	\$208
11/23/2010	2.1	Began review of 5th Supplemental 26 Disclosure	JLN	\$520	\$1,092
11/23/2010	2.75	Letter to Compel Osgood to appear at deposition	JLN	\$520	\$1,430
11/23/2010	0.2	Read through emails from class member; reviewed deposition transcripts to be given to O/C.	SCB	\$240	\$48
11/24/2010	0.4	Read/edit letter to ct re: Osgood	BJP	\$310	\$124
11/24/2010	3.2	Drafted letter motion to compel defendants to produce P.J. Osgood for deposition in Chicago and to provide outstanding discovery (3rd doc. demands ? Oct. 8); also moved to preclude defendants based on untimely disclosure of new IJL witnesses (Amber Merz, Peter & Sydney Rowland)	JLN	\$520	\$1,664
11/24/2010	4.7	Edited letter to Court re: PJ Osgood; hand-delivered dep transcripts to O/C's office; hand-delivered letter to court; emailed with case team; faxed letter to Klein; reviewed emails from class member.	SCB	\$240	\$1,128
11/28/2010	0.7	Conducted preliminary review of IJL's Response to plaintiff's 3rd request for documents, with attachments; several docs still not provided	JLN	\$520	\$364

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/28/2010	1.4	Reviewed Karen Malak's feedback sheet for dates set up on through Chicago Office; took notes re same	JLN	\$520	\$728
11/28/2010	0.1	Reviewed letter to Malak putting her on hold & Reviewed letter to IJL Chicago from Malak demanding refund.	JLN	\$520	\$52
11/29/2010	4.7	Emailed with JLN and case team re: next steps; gathered documents for JLN; reviewed defendants' discovery responses; emailed with JLN re: same; cleaned up PA; sorted emails.	SCB	\$240	\$1,128
11/29/2010	0.3	Touch base with case team re: status and documents	JGB	\$690	\$207
11/29/2010	1.1	Reviewed Coordinator Training DVD (from Feb. 2006); took notes re: same	JLN	\$520	\$572
11/29/2010	0.3	IJL Training Webinar	JLN	\$520	\$156
11/29/2010	7.6	Started prepping outline for D. Dolan (IJL Co-founder)	JLN	\$520	\$3,952
11/29/2010	0.2	Read and sort case emails	BJP	\$310	\$62
11/30/2010	2.9	Emailed with case team; monthly tune-up; emailed with class members.	SCB	\$240	\$696
11/30/2010	1.4	Letter Reply to BK 11-24-10 letter	JLN	\$520	\$728
11/30/2010	0.4	Drafted Reply letter motion in response to defendants' opposition to plaintiff's motion for a protective order to quash the subpoena on plaintiff's counsel	JLN	\$520	\$208
11/30/2010	5.4	Cont'd working on outline for D. Dolan dep	JLN	\$520	\$2,808
11/30/2010	2.5	Traveled to Chicago for deposition of P.J. Osgood (5.0)	JLN	\$520	\$1,300
11/30/2010	3.75	Cont'd working on outline for D. Dolan dep	JLN	\$520	\$1,950

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/1/2010	0.2	Review earlier e-mails; touch base with SCB re: status of documents	JGB	\$690	\$138
12/1/2010	2.5	Reviewed invoice; emailed with class members; emailed with JLN re: service on IJL Chicago franchise; called MFI re: same; updated PA court filed documents.	SCB	\$240	\$600
12/1/2010	4.8	Finished working on outline for D. Dolan	JLN	\$520	\$2,496
12/2/2010	1.5	Emailed with class members re: monthly tune-ups; emailed with named-plaintiffs re: interrogatory verifications; update class member lists.	SCB	\$240	\$360
12/2/2010	5.3	Deposition of Osgood	JLN	\$520	\$2,756
12/2/2010	0.4	Meet & confer with defense counsel re: outstanding discovery owed by defendants	JLN	\$520	\$208
12/2/2010	0.3	Letter to Judge withdrawing Motion to Compel	JLN	\$520	\$156
12/3/2010	2.8	Spoke to class member (Kathryn Polacik); created engagement letter; emailed with MJN re: same; updated class member list; emailed with JLN re: next steps and letter sent to court; updated PA and case diaries; sorted emails.	SCB	\$240	\$672
12/3/2010	3.25	Traveled back to NYC from Chicago (6.50)	JLN	\$520	\$1,690
12/4/2010	4.3	Started drafting dep. outline for J. Foster (IJL employee)	JLN	\$520	\$2,236
12/5/2010	3.9	Continued working on dep. outline for J. Foster	JLN	\$520	\$2,028
12/6/2010	2.6	Read through discovery responses and previous correspondence with the Court; emailed with JLN re: next steps.	SCB	\$240	\$624
12/6/2010	3.2	Prepared Supplemental Responses to 3rd Demand for Docs	JLN	\$520	\$1,664

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/6/2010	1.2	Drafted letter to Court seeking permission to take more than 10 depositions in this case and setting forth reasons why	JLN	\$520	\$624
12/7/2010	5.4	Read through deposition transcript of Epstein; scanned in Epstein transcript; picked up transcripts from JLN; hand-delivered transcripts to Klein's office; reviewed letter sent from Klein to Court re: discovery; emailed with case team re: same.	SCB	\$240	\$1,296
12/7/2010	0.6	Letter to Judge re: Foster McGinty	JLN	\$520	\$312
12/7/2010	2.8	Finished dep. outline for J. Foster	JLN	\$520	\$1,456
12/7/2010	4.3	Reviewed supplemental disclosure provided by defendants following meet & confer re: plaintiffs' third request for documents, including: radio ads, CR tracking Hallandale, escalated Crs, & IJL financials	JLN	\$520	\$2,236
12/7/2010	0.1	Reviewed letter from BK to court re: excusing Andrea McGinty from depositions based on purported medical conditions	JLN	\$520	\$52
12/8/2010	3.9	Read through Pannucci deposition transcript; emailed with JLN re: Klein's expense request; emailed with MJN re: same; created expense request; read through letter from Klein.	SCB	\$240	\$936
12/8/2010	1.1	Reviewed IJL training guidelines re: Marketing Activities; took notes re: same.	JLN	\$520	\$572
12/9/2010	6.3	Read through deposition transcript of Robert Vador; read through letter to court from JLN; read through emails between case team re: court conference; filed stipulation for protective order with the court; emailed with JLN re: same; searched local rules for procedure on filing stips; scanned in all IJL document production; reviewed document production.	SCB	\$240	\$1,512
12/9/2010	0.3	Send/read case emails re: Fox ruling	BJP	\$310	\$93

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/9/2010	0.9	Reviewed IJL's guidelines for evaluating performance of sales director; took notes re: same	JLN	\$520	\$468
12/9/2010	0.4	Telephone Conference held on 12/9/2010 re: McGinty & JLN subpoena	JLN	\$520	\$208
12/9/2010	0.1	Letter to BK enclosing CD with several hundred pics taken from Florida Call Center inspection	JLN	\$520	\$52
12/9/2010	1.4	Reviewed IJL guidelines for hiring coordinators; took notes re: same	JLN	\$520	\$728
12/9/2010	0.6	Reviewed IJL's ads for Director position in papers & on Internet	JLN	\$520	\$312
12/9/2010	1.8	Reviewed IJL guidelines for hiring sales director; qualities sought; true nature of position; took notes re: same	JLN	\$520	\$936
12/10/2010	0.6	Reviewed 2nd Supplemental Answering Defendants' Second Supplemental Rule 26 Disclosure; took notes re: same	JLN	\$520	\$312
12/10/2010	0.8	Reviewed IJL's guidelines for managing coordinator; took notes re: same	JLN	\$520	\$416
12/10/2010	0.9	Reviewed IJL's Monthly Quota Memos; took notes re: same	JLN	\$520	\$468
12/10/2010	0.1	Reviewed IJL's guidelines for dealing with the Better Business Bureau	JLN	\$520	\$52
12/11/2010	1.4	Reviewed discovery responses provided by defendants re: plaintiffs Fourth Request for Documents; viewed CD provided as part of response; took notes re: same	JLN	\$520	\$728
12/11/2010	0.3	Reviewed IJL's guidelines of gender ratio expectations in each office	JLN	\$520	\$156
12/12/2010	2.3	Review discovery status; review cases re: class cert in light of discovery	JGB	\$690	\$1,587

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/13/2010	5.1	Emailed with JLN re: deposition prep; searched for necessary documents; put together court-file binders; emailed with lead-plaintiff.	SCB	\$240	\$1,224
12/13/2010	3.5	Travel to Los Angeles for 12/14/10 deposition of Jennifer Foster (7.0)	JLN	\$520	\$1,820
12/13/2010	1.9	Reviewed Dolan deposition transcript; took notes re: same	JLN	\$520	\$988
12/13/2010	0.1	Reviewed cover letter from Assistant Attorney General, James Morrissey, Esq., re: subpoena for statements given by Irene Lacota & Robert Vandor in connection with AG investigation into IJL. Transcripts sent along w/ letter(will review at later date)	JLN	\$520	\$52
12/13/2010	1.7	Reviewed IJL Memos to staff	JLN	\$520	\$884
12/14/2010	0.6	Spoke to current IJL client on phone; emailed with her; reviewed IJL contract.	SCB	\$240	\$144
12/14/2010	5.8	Deposition of Foster	JLN	\$520	\$3,016
12/15/2010	1.9	Left voicemail for Orders and Judgments at SDNY to inquire about stipulation and proposed order; listened to voicemail from Orders and Judgments; spoke to them re: same; emailed with case team re: same; searched for American Lawyer article on IJL; emailed with case team re: same.	SCB	\$240	\$456
12/15/2010	1.3	Review discovery production and devise next steps; review class cert decisions	JGB	\$690	\$897
12/15/2010	0.3	Reviewed FDU Training Schedule & Agenda; highlighted for use in Dolan's upcoming dep.	JLN	\$520	\$156
12/15/2010	1.4	Reviewed Osgood Deposition Transcript; took notes re: same	JLN	\$520	\$728
12/15/2010	1.1	Reviewed IJL's Advertising's Profit & Loss Statements took notes re: same	JLN	\$520	\$572

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/16/2010	1.5	Write year end client letter; email JGB re: next steps/discuss with SCB	BJP	\$310	\$465
12/16/2010	4.8	Emailed with Nicole from JLN's office; met to discuss next steps with her; reviewed further document production from Klein; PA saved all necessary documents; cleaned up PA; reviewed court-filing.	SCB	\$240	\$1,152
12/16/2010	2.7	Letter to Judge Precluding Defense Witnesses (reply to Def Opp)	JLN	\$520	\$1,404
12/16/2010	0.1	Reviewed Stipulation & Protective Order regarding confidential information produced by subpoenaed non-parties	JLN	\$520	\$52
12/16/2010	1	Travel to Costa Mesa, Los Angeles for 12/17/10 deposition of Daniel Dolan (2.0)	JLN	\$520	\$520
12/17/2010	3.6	Went through discovery documents; emailed with JLN and Nicole from JLN's office; reviewed deposition transcripts from AG investigation; reviewed letter sent to court from JLN.	SCB	\$240	\$864
12/17/2010	0.3	Letter to Judge to delay interrogatories on McGinty for one day	JLN	\$520	\$156
12/17/2010	7	Took dep. of D. Dolan	JLN	\$520	\$3,640
12/18/2010	4.5	Traveled back to NYC from LA (9.0)	JLN	\$520	\$2,340
12/19/2010	4.4	Began drafting interrogatories for A.McGinty (founder of IJL) in lieu of deposition, per MJ Fox's order	JLN	\$520	\$2,288
12/20/2010	4.1	Read through interrogatories to Andrea McGinty; put together all interrogatory verifications and errata sheets; sent to opposing counsel; emailed with JLN re: same; emailed with Nicole re: deposition transcript of Cami Craig; called Veritext reporting several times to determine how to get transcript; emailed with Nicole re: same.	SCB	\$240	\$984

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/20/2010	4.3	Finished drafting interrogatories for A. McGinity	JLN	\$520	\$2,236
12/20/2010	3.4	Continued drafting interrogatories for A.McGinity in lieu of dep	JLN	\$520	\$1,768
12/20/2010	0.4	Drafted letter to Court re: setting up briefing schedule for plaintiffs' motion for class certification & plaintiff's opp to defendants SJ motion & advising ct. of delays in receiving dep. transcripts	JLN	\$520	\$208
12/21/2010	3.2	Spoke to Nicole from JLN's office re: interrogatories to McGinty; searched for document production to give to Klein; delivered documents to Klein; spoke to court reporter for Cami Craig deposition; emailed with JLN and case team; reviewed letter to court from JLN re: briefing schedule.	SCB	\$240	\$768
12/21/2010	2.1	Started prep of letter to Judge to compel deps	JLN	\$520	\$1,092
12/21/2010	0.1	Letter to Judge requesting briefing schedule for Motions	JLN	\$520	\$52
12/22/2010	1.3	Review discovery status including final discovery documents produced	JGB	\$690	\$897
12/22/2010	0.3	Letter to BK enclosing Jones Day documents	JLN	\$520	\$156
12/22/2010	0.2	Letter to BK enclosing CD of close-up photos from Call Center	JLN	\$520	\$104
12/22/2010	3.7	Reviewed all of documents provided by Jones Day re: Riverside and financial records relating to IJL; sent copy of same to P.Wilner (accountant) for his review & explanation of same during telecon. tomorrow	JLN	\$520	\$1,924
12/22/2010	2.1	Monthly tune-up; emailed with Nicole from JLN's office re: letters to O/C.	SCB	\$240	\$504
12/23/2010	2.7	Updated sum doc; scanned in transcripts; hand-delivered transcripts; emailed opposing counsel; email class members.	SCB	\$240	\$648

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/23/2010	0.2	Reviewed IJL's 3 Day Cancel Refund Tracking Chart (Jan. 08 through Feb. 2009)	JLN	\$520	\$104
12/23/2010	0.2	Reviewed Draft Memo re: Fla. Call Center for possible use in upcoming motion practice.	JLN	\$520	\$104
12/23/2010	0.4	Reviewed list of all complaints filed against IJL fla call ctr for July 2009 - Oct. 2010	JLN	\$520	\$208
12/23/2010	0.2	Reviewed IJLs CR Refund Tracking Chart.	JLN	\$520	\$104
12/23/2010	0.9	Telecon w/P. Wilner re: his interpretation of Riverside's financial records for IJL	JLN	\$520	\$468
12/23/2010	0.1	Reviewed Affidavit of Compliance from Irene LaCota re: forwarding to all NY Franchises the findings of NY AG's office.	JLN	\$520	\$52
12/23/2010	4.25	Reviewed prior testimony of Irene LaCota from March 21, 2007, as given in the AG's investigation into IJL re: overcharging NY residents; took notes and drafted bullet point summary of key testimony	JLN	\$520	\$2,210
12/23/2010	0.1	Reviewed Memo from Kevin Bazner to all New York IJL Franchises re: AG's findings.	JLN	\$520	\$52
12/24/2010	2.6	Reviewed deposition transcript of Irene LaCota; took notes re: same	JLN	\$520	\$1,352
12/26/2010	1.8	Reviewed deposition transcript of Jill Vandor; took notes re: same	JLN	\$520	\$936
12/26/2010	2.1	Reviewed deposition transcript of Robert Vandor; took notes re: same	JLN	\$520	\$1,092
12/28/2010	2.8	Reviewed deposition transcript of Nancy Epstein; took notes re: same	JLN	\$520	\$1,456
12/29/2010	3.1	Reviewed deposition transcript of Melissa Brown; took notes re: same.	JLN	\$520	\$1,612

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/29/2010	2.7	Reviewed deposition transcript of Julie Novotny; took notes re: same	JLN	\$520	\$1,404
12/30/2010	2.6	Reviewed deposition transcript of Jennifer Panucci; took notes re: same	JLN	\$520	\$1,352
12/31/2010	0.1	e-mail from BK re: interrogatory responses from Andrea McGinty	JLN	\$520	\$52
12/31/2010	2.9	Reviewed deposition transcript of Angel Valesquez; took notes re: same	JLN	\$520	\$1,508
1/1/2011	0.4	Letter from BK requesting payment for airline article copies	JLN	\$520	\$208
1/2/2011	2.2	Reviewed deposition transcript of P.J. Osgood; took notes re: same	JLN	\$520	\$1,144
1/2/2011	3.1	Reviewed deposition transcript of Cami Craig; took notes re: same	JLN	\$520	\$1,612
1/3/2011	2.9	Emailed with JLN re: documents exchanged by defense counsel; emailed with BJP re: call with Court; went to JLN's office for call with Judge Fox and O/C; discussed call and next steps with case team.	SCB	\$240	\$696
1/3/2011	3.2	Reviewed deposition transcript of Daniel Dolan; took notes re: same	JLN	\$520	\$1,664
1/4/2011	3.4	Reviewed interrogatories to McGinty and Defendants' responses.	SCB	\$240	\$816
1/4/2011	1.7	Reviewed Malak deposition transcript; took notes re: same	JLN	\$520	\$884
1/5/2011	0.2	Email with SCB re: case schedule	BJP	\$310	\$62
1/5/2011	2.3	Reviewed documents in PA to compile list of docs we have to determine with JLN's office what is missing; reviewed order from court; emailed with case team re: same.	SCB	\$240	\$552

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/5/2011	1.9	Reviewed all IJL Delta sky ads obtained through discovery; flagged most misleading ads & took notes re: same	JLN	\$520	\$988
1/5/2011	0.1	Reviewed Court Order re: supplementing outstanding cross-motion for partial summary judgment	JLN	\$520	\$52
1/6/2011	3.1	Updated summary documents; cleaned up PA; edited case diary; emailed with JLN's Nicole re: Jenn Foster dep transcript; downloaded program to view transcript; saved in PA.	SCB	\$240	\$744
1/6/2011	1.25	Reviewed A. McGinity's response to interrogatories; took notes re: same	JLN	\$520	\$650
1/7/2011	1.6	Reviewed deposition transcripts; updated case diary; emailed with BJP re: next steps.	SCB	\$240	\$384
1/7/2011	2.6	Reviewed all offices identified by IJL as still having physical office addresses; conducted independent research to confirm IJL's claims regarding existence of such offices	JLN	\$520	\$1,352
1/8/2011	1.9	Reviewed minutes of IJL Board meetings b/w 2007 and present; took notes re: same	JLN	\$520	\$988
1/8/2011	0.4	Reviewed IJL's national radio ad on Sirius; took notes re same	JLN	\$520	\$208
1/8/2011	0.3	Reviewed IJL's TV commercial (testified to by I. LaCota); took notes re: same	JLN	\$520	\$156
1/9/2011	0.6	Reviewed IJL's disclosure of all international offices claimed to exist ; did independent research to confirm IJL's claims regarding existence of such offices	JLN	\$520	\$312
1/10/2011	3.2	PA saved electronic file of Dolan deposition transcript; read through interrogatories to draft response to Klein's responses; discussed briefly with BJP; sorted emails.	SCB	\$240	\$768

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/11/2011	2.9	Reviewed files to determine missing deposition transcripts; emailed with JLN's office re: same; went to JLN's office to discuss same with Nicole; searched for missing transcripts; emailed with BJP re: interrogatory responses.	SCB	\$240	\$696
1/11/2011	1.5	Review McGinty responses, take notes, write summary email to SCB, discuss with SCB	BJP	\$310	\$465
1/11/2011	0.9	Reviewed docs relating to Angel Valesquez's termination from IJL; took notes re: same	JLN	\$520	\$468
1/11/2011	1.4	T/c w/Angel re: alleged grounds for termination per docs provided by IJL	JLN	\$520	\$728
1/12/2011	4.3	Scanned in all transcripts from depositions taken by JLN; sorted emails.	SCB	\$240	\$1,032
1/12/2011	0.6	Reviewed docs relating to Michelle LePage's termination from IJL; took notes re: same	JLN	\$520	\$312
1/12/2011	1.2	T/c w M.LePage re: purported grounds for dismissal from IJL	JLN	\$520	\$624
1/13/2011	0.6	Searched office and desktop for LaCota deposition transcript; emailed Nicole re: same.	SCB	\$240	\$144
1/13/2011	0.1	Reviewed Affidavit of Rachel Wilson re: absence of any draft documents (except one) re: creation of Fla. Call Ctr	JLN	\$520	\$52
1/13/2011	0.8	Reviewed Tortora deposition transcript	JLN	\$520	\$416
1/13/2011	1.2	Reviewed Rodriguez deposition transcript	JLN	\$520	\$624
1/13/2011	1.1	Reviewed Cameron Deposition transcript	JLN	\$520	\$572
1/13/2011	0.3	Telephone Conference held today Defendants will supplement cross motion for summary judgment by 1/26/11; Plaintiffs will respond by 2/16/11; Defendants will reply by 2/28/11	JLN	\$520	\$156

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/13/2011	5.2	Reviewed several hundred IJL ads from national magazines; took notes re: same selected a few ads for possible use in SJ opp motion.	JLN	\$520	\$2,704
1/14/2011	3.9	Picked up more deposition transcripts from Nicole; scanned in originals of Dolan, Novotny, and Brown deposition transcripts; emailed with Nicole re: dep dates and transcripts; reviewed minute entry for phone call with Fox.	SCB	\$240	\$936
1/17/2011	0.2	Letter to Judge re: voluntary dismissal	JLN	\$520	\$104
1/17/2011	0.4	Drafted letter to court re: voluntary dismissal of Sandra Burga & Karen McBride based on their respective failures to attend a deposition	JLN	\$520	\$208
1/18/2011	1.9	Scanned in Dolan transcript's exhibits; saved Malak dep to files; hand-delivered Dolan and Foster transcripts to O/C.	SCB	\$240	\$456
1/19/2011	2.9	Saved Bruno dep transcript; read through dep transcript; sorted emails.	SCB	\$240	\$696
1/19/2011	1.1	Reviewed Bruno deposition transcript; took notes re: same	JLN	\$520	\$572
1/20/2011	2.4	Emailed with Nicole from JLN's office re: defendants' production; picked up airline ads; scanned and saved in PA; reviewed ads; emailed case team re: Burga email.	SCB	\$240	\$576
1/21/2011	0.6	Updated summary document and case diary; emailed Burga re: deposition.	SCB	\$240	\$144
1/24/2011	1.2	Reviewed court order dismissing McBride and Burga as named plaintiffs; emailed with BJP re: same; emailed and spoke via telephone with potential class member.	SCB	\$240	\$288
1/24/2011	0.1	Email with SCB	BJP	\$310	\$31
1/24/2011	1	Prepared letter to Judge Fox requesting that the claims of Sandra Burga and Karen McBride be discontinued with prejudice under Rule 41(a)(2).	JLN	\$520	\$520

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/24/2011	0.5	Prepared Supplemental Responses to McGinty Interrogatories	JLN	\$520	\$260
1/25/2011	2.9	Received email from O/C re: errata sheets for remaining plaintiffs' depositions; emailed with JLN re: same; responded to Klein email; searched for transcripts; sent Bruno hers; emailed with JLN re: Malak transcript; emailed Rodriguez re: status of errata sheet; reviewed supplemental responses from Klein.	SCB	\$240	\$696
1/26/2011	2.3	Reviewed court-filings; saved in PA; emailed Klein re: undeposited check; emailed with Karen Malak re: her deposition transcript; went to JLN's office to discuss missing documents with Nicole.	SCB	\$240	\$552
1/26/2011	0.4	Reviewed Rule 56.1 Statement	JLN	\$520	\$208
1/26/2011	3.25	Reviewed supplemental Decl. by BK in support of defendants' motion to dismiss fraud claim; examined all attached exhibits to declaration & took notes re same for use in response to defendants' motion	JLN	\$520	\$1,690
1/26/2011	3.3	Reviewed Supplemental Memorandum of Law in Support Cross Motion for Partial Summary Judgment; took notes re: same, researched cases therein	JLN	\$520	\$1,716
1/27/2011	0.2	Print/discuss IJL motion with SCB	BJP	\$310	\$62
1/27/2011	1.3	Emailed with Lisa Bruno re: deposition transcript; read email from JLN re: fraudulent inducement CMSJ; discussed same with BJP.	SCB	\$240	\$312
1/27/2011	2.25	Reviewed affidavit provided by Jill Vandor re: Bruno and Rodriguez; took notes re: same and created bullet point summary of most salient points	JLN	\$520	\$1,170

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/27/2011	2.7	Prepared chart of verbatim language found in affidavits of Anna Anderson, Pamela Joyce Osgood, M. Brown and Jill Vador for use in SJ Opp.	JLN	\$520	\$1,404
1/28/2011	0.3	Emailed with Lisa Bruno re: deposition transcript review; updated case diary.	SCB	\$240	\$72
1/28/2011	4.25	Highlighted transcript of Michelle LePage; selected testimony for use in opp. to SJ motion; extracted quotes & put into draft opp	JLN	\$520	\$2,210
1/28/2011	3.4	Highlighted dep. transcript of Angel Valesquez for SJ motion; selected testimony for use in opp. to SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$1,768
1/29/2011	4.25	Highlighted dep. transcript of Daniel Dolan; selected best quotes for use in opp. to SJ motion; put into draft opp	JLN	\$520	\$2,210
1/29/2011	3.8	Highlighted dep. transcript of Melissa Brown selected testimony for opp. to SJ; chose best quotes & put into draft opp	JLN	\$520	\$1,976
1/29/2011	3.6	Highlighted dep. of Cami Craig selected testimony for use in opp. to SJ motion; extracted quotes & put into draft opp.	JLN	\$520	\$1,872
1/30/2011	3.1	Highlighted dep. transcript of Lisa Bruno; selected best quotes for use in opp. to SJ motion; put into draft opp.	JLN	\$520	\$1,612
1/30/2011	2.9	Highlighted deposition of Christine Rodriguez; selected specific testimony for use in opp. to SJ motion; extracted quotes & put into draft opp	JLN	\$520	\$1,508
1/30/2011	3.1	Highlighted dep. transcript of James Tortora; selected testimony for use in opp. to SJ motion; extracted quotes & put into draft opp	JLN	\$520	\$1,612
1/31/2011	0.8	Read MSJ, affidavit, and 56.1 statement	BJP	\$310	\$248

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/31/2011	3.4	Highlighted dep. transcript of Jill Vandor; selected testimony for SJ motion; extracted quotes into draft brief	JLN	\$520	\$1,768
1/31/2011	2.5	Highlighted dep. transcript of Karen Malak; selected testimony for use in opp. to SJ motion; extracted quotes & put into draft opp.	JLN	\$520	\$1,300
1/31/2011	3.1	Highlighted dep. transcript of Irene LaCota; selected testimony for SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$1,612
1/31/2011	3.3	Read through CMSJ brief; picked up exhibits from JLN's office; reviewed and saved in PA; created motion memo; emailed with JLN re: status of rule 56.1 opposition; monthly tune-up.	SCB	\$240	\$792
2/1/2011	0.1	Read SCB email to JLN re: 56.1 statement	BJP	\$310	\$31
2/1/2011	3.7	Highlighted dep. transcript of Nancy Epstein; selected testimony for SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$1,924
2/1/2011	3.8	Highlighted dep. transcript of Jennifer Foster; selected testimony for SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$1,976
2/1/2011	2.9	Highlighted dep. transcript of Robert Vandor; selected testimony for SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$1,508
2/1/2011	2.8	Reviewed potential class member email; responded to email; responded to class member responses from update email; discussed CMSJ with BJP; PA saved exhibits for CMSJ.	SCB	\$240	\$672
2/2/2011	0.2	Discuss 56.1 statement with SCB	BJP	\$310	\$62
2/2/2011	4.1	Highlighted dep. transcript of Jennifer Panucci; selected testimony for SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$2,132

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/2/2011	4.4	Highlighted dep. transcript of Julie Novotny; selected testimony for SJ motion; extracted quotes & put into draft brief	JLN	\$520	\$2,288
2/2/2011	3.1	Re-read CMSJ; read Rule 56.1 statement; emailed with AK re: project; discussed with BJP; read through affidavits for CMSJ.	SCB	\$240	\$744
2/3/2011	8.9	Worked on CMSJ Rule 56.1 Opposition; met with AK to discuss same; discussed with BJP.	SCB	\$240	\$2,136
2/3/2011	1.9	Worked on opposition to Rule 56.1 document for Lisa Bruno.	AAK	\$195	\$371
2/3/2011	2.5	Work on 56.1 statement reply	BJP	\$310	\$775
2/4/2011	3.8	Worked on opposition to Rule 56.1 document for Lisa Bruno.	AAK	\$195	\$741
2/4/2011	3.4	Work on 56.1 Statement; emails with SCB; bring exhibit disc to Nicole on 27	BJP	\$310	\$1,054
2/4/2011	4.7	Finished Rodriguez portion of Rule 56.1 statement; reviewed Bruno portion completed by AK; continued typing Rule 56.1 statement opposition template; emailed with BJP.	SCB	\$240	\$1,128
2/6/2011	1.6	Worked on Rule 56.1 statement opposition.	SCB	\$240	\$384
2/7/2011	9.9	Worked on Rule 56.1 statement; emailed with BJP and AK re: same; incorporated edits; emailed JLN re: same.	SCB	\$240	\$2,376
2/7/2011	2.3	Worked on opposition to rule 56.1 statement on Malak.	AAK	\$195	\$449
2/7/2011	2.7	Type admissions/denials for 56.1 reply; edit near complete version of 56.1 reply	BJP	\$310	\$837
2/8/2011	0.4	Email with SCB/Nicole; find/email documents to JLN/Nicole	BJP	\$310	\$124
2/8/2011	1.2	Reviewed Foster deposition transcript; took notes re: same	JLN	\$520	\$624

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/8/2011	1.9	Researched issue of reliance in fraud claims	JLN	\$520	\$988
2/8/2011	3.2	Researched case law re: fraudulent inducement claims in 2d Cir	JLN	\$520	\$1,664
2/8/2011	4.25	Researched case law re: fraudulent inducement under NY law	JLN	\$520	\$2,210
2/8/2011	0.4	Emailed with Nicole re: deposition transcripts; emailed with BJP re: same; reviewed court filing and emailed with BJP re: same; emailed other analyst re: sending of dep transcripts to JLN's office.	SCB	\$240	\$96
2/9/2011	3.7	Researched issue of fraudulent concealment under state/federal law	JLN	\$520	\$1,924
2/9/2011	3.6	Researched differences between fraudulent inducement v. breach of contract claim under state and fed. law	JLN	\$520	\$1,872
2/9/2011	0.8	Prepared letter to MJ Fox requesting extensions on briefing deadline	JLN	\$520	\$416
2/9/2011	3.2	Emailed with case team re: size of NY Class; reviewed Defendants' discovery production; discussed with BJP; emailed with JLN re: same; reviewed letter from JLN to Court re: extension of time to oppose motion; discussed same with BJP; reviewed order from Fox granting extension; emailed with case team re: same.	SCB	\$240	\$768
2/10/2011	1.5	Research for JLN	BJP	\$310	\$465
2/10/2011	2.5	Researched legal differences between statement of present fact v. future promises.	JLN	\$520	\$1,300
2/11/2011	1.8	Emailed Lisa Bruno re: errata sheets and deposition transcript; emailed with case team re: 394-c(2) claim; emailed with potential class member; sorted emails from time away.	SCB	\$240	\$432

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/11/2011	9.2	Started constructing global summary of all facts adduced during discovery relevant to disposition of defendants' SJ motion	JLN	\$520	\$4,784
2/11/2011	1.8	Began drafting preliminary statement for opposition brief to defendants' SJ motion	JLN	\$520	\$936
2/12/2011	11.4	Continued working on global summary of facts relevant to fraud claim to defeat def's SJ motion	JLN	\$520	\$5,928
2/13/2011	10.6	Continued working on global summary of facts relevant to fraud claim	JLN	\$520	\$5,512
2/14/2011	0.3	Read Stein's order, email with case re: its meaning	BJP	\$310	\$93
2/14/2011	12.25	Finished global summary of facts; added full citations to the record; began to organize for use in our SJ opp	JLN	\$520	\$6,370
2/14/2011	0.2	Received Court's Order - The pending motions in this case [document nos. 101, 107, and 118] are dismissed without prejudice	JLN	\$520	\$104
2/14/2011	0.6	Sorted emails; reviewed court filing adjourning motions; emailed with case team re: same.	SCB	\$240	\$144
2/15/2011	0.1	Email JLN re: research/writing assistance	BJP	\$310	\$31
2/15/2011	2.6	Drafted section re: standard of review for fraudulent inducement claim in summary judgment context, as well as gen. std of review for summary judgment claims	JLN	\$520	\$1,352
2/15/2011	3.4	Drafted section of brief re: all plaintiffs told that there were two matches in mind	JLN	\$520	\$1,768
2/15/2011	1.1	Emailed with JLN re: document for brief; discussed work needed to be done with BJP.	SCB	\$240	\$264
2/16/2011	1.4	Emailed with case team re: research; met with case team to discuss next steps; emailed with JLN re: transcripts needed.	SCB	\$755	\$1,057

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/16/2011	0.2	Emails with case team re: research support and meeting;	BJP	\$310	\$62
2/16/2011	3.8	Drafted section of brief re: plaintiffs relied upon the false statements	JLN	\$520	\$1,976
2/16/2011	4.25	Drafted section of brief re: scienter & statements made knowingly/recklessly	JLN	\$520	\$2,210
2/17/2011	4.2	Assist with MSJ Opposition Brief: search files for documents and research; email with JLN and SCB re: documents	BJP	\$310	\$1,302
2/17/2011	6.2	Started drafting Supplemental Declaration setting forth additional circumstantial evidence of fraudulent intent by IJL (drafted sections re: lies to FAQ's from clients)	JLN	\$520	\$3,224
2/17/2011	3.4	Drafted section of brief re: statements were intended to deceive plaintiff	JLN	\$520	\$1,768
2/17/2011	1.7	Drafted section of brief re: contract should be voided based on false representations by IJL	JLN	\$520	\$884
2/17/2011	2.1	Drafted section of brief re: fraudulent concealment and gen. law for this claim	JLN	\$520	\$1,092
2/17/2011	0.9	Emailed with case team re: documents JLN requested; spoke to Marietta Manayan, a class member, re: her experience with IJL.	SCB	\$240	\$216
2/18/2011	4.7	Continued working on fraudulent concealment, including section on local phone numbers, section on mistaken beliefs of callers & section on large # of complaints against Call Center	JLN	\$520	\$2,444
2/18/2011	5.2	Worked on section of brief re: defendants' wilful concealment of call center and their efforts to deliberately mislead callers	JLN	\$520	\$2,704
2/19/2011	9.4	Extensive edits, revisions, deletions and additions to draft brief	JLN	\$520	\$4,888

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/19/2011	1.6	Drafted Declaration of Janeen Cameron; spoke w/ client& made edits per feedback	JLN	\$520	\$832
2/19/2011	1.5	Drafted Declaration of Karen Malak-Rocush spoke w/ client& made revisions per her feedback	JLN	\$520	\$780
2/20/2011	11.25	Continued making extensive edits, revisions & additions to all sections of brief	JLN	\$520	\$5,850
2/21/2011	10.4	Continued making edits & revisions to brief; inserted all missing citations from the record, and also filled in all missing case cites; completed final draft of brief	JLN	\$520	\$5,408
2/22/2011	1.8	Review and edit MSJ	JGB	\$690	\$1,242
2/22/2011	0.2	E-mail exchange with John Balestriere regarding Opposition Brief and Plaintiff's Supplemental Declaration	JLN	\$520	\$104
2/22/2011	3.6	Started putting together all documents, needed for Declaration in Opposition to defendants' SJ motion	JLN	\$520	\$1,872
2/22/2011	4.9	Started working on Plaintiffs' Response to Defendants' Rule 56.1statement (Paragraphs 1-22), including all relevant citations to record to refute defendants' claims	JLN	\$520	\$2,548
2/22/2011	2.1	Drafted Affidavit of Beth Starling; spoke to client & made revisions based on feedback	JLN	\$520	\$1,092
2/22/2011	2.4	Drafted Affidavit of Dana Bijj; spoke to client re: same; made further revisions/edits based on client's feedback	JLN	\$520	\$1,248
2/22/2011	4.3	Reviewed notes from previous phone calls with Beth Starling and Dana Bijj; spoke to these women on the phone to discuss experiences; drafted affidavits for Starling and Bijj; emailed with JLN re: same; spoke to JLN on phone re: same; reviewed letter from O/C re: costs; emailed with case team re: same.	SCB	\$240	\$1,032

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/22/2011	1.6	Read CMSJ; review affidavit/discuss with SCB	BJP	\$310	\$496
2/23/2011	1.1	Read and re-read JLN's CMSJ, take notes, write email to case team with notes	BJP	\$310	\$341
2/23/2011	1.6	Reviewed draft Affidavits of Beth Starling, Dana Bijj, Malak and Cameron clients of IJL; made corrections to same	JLN	\$520	\$832
2/23/2011	5.25	Continued working on Plaintiffs' Response to Defendants' Rule 56.1 statement (Paragraphs 23-47), inserting all relevant citations to refute defendants claims	JLN	\$520	\$2,730
2/23/2011	3.9	Finished working on assembling all documents needed for Declaration in Opposition to defendants' SJ motion	JLN	\$520	\$2,028
2/23/2011	2.7	Continued working on assembling all documents needed for Declaration in Opposition to defendants' SJ motion	JLN	\$520	\$1,404
2/23/2011	4.9	Put together affidavits for Rodriguez, Malak, Cameron, and edited Starling and Bijj affidavits; emailed with JLN re: same; emailed with named plaintiffs; emailed all individuals their affidavits.	SCB	\$240	\$1,176
2/24/2011	1.9	Assist JLN with CMSJ	BJP	\$310	\$589
2/24/2011	3.3	Gathered documents for CMSJ opposition; emailed with JLN and his office re: opposition brief; emailed with class member.	SCB	\$240	\$792
2/24/2011	3.25	Drafted Affidavit of Christine Rodriguez; made revisions per client's feedback; finalized for SJ motion.	JLN	\$520	\$1,690
2/24/2011	4.8	Continued working on Plaintiffs' Response to Defendants' Rule 56.1 statement (Paragraphs 48-69), inserting citations to record for each response	JLN	\$520	\$2,496
2/24/2011	1.6	Drafted plaintiffs' Local Rule 56.1 Statement re: material facts in dispute	JLN	\$520	\$832

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/25/2011	1.4	Assisted in preparing documents for filing.	ABG	\$210	\$294
2/25/2011	0.3	Print and prepare bluebacks; prepare exhibit labels	JDA	\$210	\$63
2/25/2011	5.2	Assist with CMSJ: write letter to court, edit and format CSL affidavit, review declaration, miscellaneous research, case team emails, print exhibits	BJP	\$310	\$1,612
2/25/2011	8.9	Put together deposition pages for exhibits; emailed and spoke with JLN's office re: brief; coordinated with AK and JDA re: putting together exhibit tabs; put together exhibits; called the Court re: filing deadline; called Bari Klein re: courtesy copy; emailed Klein re: same.	SCB	\$240	\$2,136
2/25/2011	0.8	Extracted certain pages from depositions and combined them into PDF files.	AAK	\$195	\$156
2/25/2011	7.25	Memorandum of Law in opposition to defendant's cross-motion	JLN	\$520	\$3,770
2/25/2011	4.8	Finalized working on Plaintiffs' Response to Defendants' Rule 56.1 statement (Paragraphs 70-98), inserting citations to record for each response	JLN	\$520	\$2,496
2/25/2011	0.4	Helped with printing exhibits and organizing tab sheets for cross motion for MSJ opposition.	SRG	\$240	\$96
2/25/2011	2.8	Prepared exhibit tabs for case documents.	AAK	\$0	\$0
2/26/2011	0.4	Sorted emails; sent affidavits to JLN.	SCB	\$240	\$96
2/28/2011	0.2	E-mail exchange with JB regarding ECF filing of Opp. Brief & Plaintiff's Supplemental Declaration	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/28/2011	4.4	Emailed with JLN and Nicole re: remaining tasks for brief; searched through Rule 56.1 statement to confirm all pages were printed from depositions for exhibits; delivered hard copy to O/C; created engagement letter for Marietta Manayan and sent to client; sorted emails.	SCB	\$240	\$1,056
3/1/2011	0.4	Prepared letter to Judge Kevin Nathaniel Fox re: filing under seal	JLN	\$520	\$208
3/1/2011	3.3	Monthly tune-up; delivered courtesy copy to the Court; emailed and spoke to JLN's office; scanned in court-filed documents; read through final brief.	SCB	\$240	\$792
3/2/2011	0.8	Emailed monthly tune-up responses to IJL class members; picked up CD and extra copies of opposition brief.	SCB	\$240	\$192
3/2/2011	0.3	Reviewed email from class member; put into PA Ferrucci's hours.	SCB	\$240	\$72
3/3/2011	0.1	Emailed phone note to SCB and told her to follow up.	JGB	\$690	\$69
3/3/2011	3.2	Read through supplemental declaration and Rule 56.1 statement final; reviewed exhibits; updated case diary.	SCB	\$240	\$768
3/4/2011	0.4	Prepared letter to clarify which documents plaintiffs seek to file under seal	JLN	\$520	\$208
3/4/2011	1.1	Spoke to class member on the phone; created phone note; emailed class member; sorted emails.	SCB	\$240	\$264
3/7/2011	2.7	Updated PA so that all deposition dates were in Events; emailed with Nicole re: Affidavit of Service.	SCB	\$240	\$648
3/8/2011	0.2	Review letter from D/C to Ct, discuss the same with SCB	BJP	\$310	\$62
3/8/2011	0.1	Reviewed defendants' letter re: filing motion papers under seal	JLN	\$520	\$52

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/8/2011	3.6	Reviewed letter sent from O/C re: expenses; emailed with MJN, JGB, and JLN re: same; searched for orders re: Plaintiffs' liability for payment; went through all receipts from O/C; called O/C; emailed class member; drafted letter to O/C re: payment.	SCB	\$240	\$864
3/9/2011	0.1	Emailed O/C re: email.	JGB	\$690	\$69
3/9/2011	1.2	Reviewed Reply Affirmation of Bari Klein; took notes regarding same	JLN	\$520	\$624
3/10/2011	0.4	Read/research D/C's MSJ reply	BJP	\$310	\$124
3/10/2011	0.2	E-mail exchange with John Balestriere regarding Opposition Brief and Plaintiff's Supplemental Declaration	JLN	\$520	\$104
3/10/2011	2.4	Familiarized self with case.	ABG	\$210	\$504
3/10/2011	5.9	Read through MSJ briefs re: fraudulent inducement claim; discussed project with ABG; began checking cites in reply brief.	SCB	\$240	\$1,416
3/11/2011	3.8	Continued searching citations in Reply brief.	SCB	\$240	\$912
3/11/2011	0.3	Combined PDF files of exhibits.	AAK	\$195	\$59
3/11/2011	2.1	Read through briefs.	ABG	\$210	\$441
3/13/2011	0.2	Prepared letter to Judge re: Confidential filings under seal	JLN	\$520	\$104
3/14/2011	1.25	Drafted letter opposing defendants' request to file motion papers under seal	JLN	\$520	\$650
3/16/2011	1.8	Discussed check with MJN; drafted letter to opposing counsel; reviewed previous orders from opposing counsel; read through letter from Klein re: filing documents under seal; emailed BJP.	SCB	\$240	\$432
3/18/2011	0.4	Updated case diary; emailed with JGB and MJN re: Dropbox; sorted emails.	SCB	\$240	\$96

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/20/2011	1.7	Transferred all IJL files to Dropbox; emailed with JGB and MJN re: same.	SCB	\$240	\$408
3/21/2011	0.1	Wrote case team email about meeting.	JGB	\$690	\$69
3/21/2011	2.1	Sorted emails; emailed with class members re: phone calls; updated summary document; continued searching for cites in reply brief.	SCB	\$240	\$504
3/22/2011	0.6	Emailed with class member; left voicemail for class member; sorted emails.	SCB	\$240	\$144
3/23/2011	2.3	Made phone calls to potential class members; put in phone notes; sorted emails; emailed with JLN's office re: reply exhibits; emailed with potential class members.	SCB	\$240	\$552
3/29/2011	0.2	Briefly discussed status of case with JGB; sorted emails.	SCB	\$240	\$48
3/30/2011	1.6	Meet with co-counsel; discuss strategy in case; review key docs in case.	JGB	\$690	\$1,104
3/31/2011	0.3	Emailed with case team re: new co-counsel; met with case team to discuss strategy.	JGB	\$690	\$207
3/31/2011	0.3	Case meeting	BJP	\$310	\$93
3/31/2011	2.5	Research out of state subpoena issue	BJP	\$310	\$775
3/31/2011	2.75	Reviewed Sealed Document with exhibits	JLN	\$520	\$1,430
3/31/2011	0.3	Reviewed Order re unsealing	JLN	\$520	\$156
3/31/2011	1.5	Monthly tune-up; emailed with class members.	SCB	\$240	\$360
4/1/2011	0.1	Reviewed order and emailed SCB re: next steps.	JGB	\$690	\$69
4/1/2011	0.4	Reviewed court order; emailed with Nicole from JLN's office re: filing; updated case diary.	SCB	\$240	\$96

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/4/2011	0.6	Review reinstatement letter; add IJL account to Thunderbird	BJP	\$310	\$186
4/4/2011	2.7	Called and emailed with Nicole from JLN's office re: filing; reviewed order reinstating pending motions to the docket; saved in PA; gathered documents to be filed electronically; called ECF regarding filing of documents without a motion to which it should be linked; ECFed all MSJ opposition documents.	SCB	\$240	\$648
4/4/2011	0.2	E-mail exchange with B. Klein requesting extension to respond to defendants brief as well as writing to Judge regarding asking the Court to put the motions back on the calendar	JLN	\$520	\$104
4/4/2011	0.2	Reviewed letter to Judge Stein from BK, re: requesting that motions 101, 107 and 118 be reinstated	JLN	\$520	\$104
4/5/2011	0.2	Listen to vmail from CR, read SCB email re: the same to JLN	BJP	\$310	\$62
4/5/2011	1.9	Emailed with class member; reviewed and saved engagement letter; emailed Nicole re: filing exhibits.	SCB	\$240	\$456
4/6/2011	0.3	Sorted emails; emailed with class member re: engagement letter.	SCB	\$240	\$72
4/7/2011	3.4	Separated all the exhibits into individual files; emailed JLN re: next steps; called ECF help desk to determine how to manually file exhibits.	SCB	\$240	\$816
4/8/2011	1.6	Emailed with JLN and Nicole re: filing of exhibits; called court re: same; further prepped exhibits for filing; updated case diary; emailed with class member.	SCB	\$240	\$384
4/11/2011	0.1	Emailed with SCB re: filing.	JGB	\$690	\$69
4/11/2011	0.3	Case emails with SCB	BJP	\$310	\$93

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/11/2011	4.4	Created exhibit tab for exhibits A through ZZZ; inserted exhibit tabs in ECF; grouped exhibits for filing; filed exhibits; emailed with class member; emailed with BJP re: response to same class member.	SCB	\$240	\$1,056
4/12/2011	0.5	Finished writing letter to court; mailed letter to court; faxed letter to O/C.	SCB	\$240	\$120
4/13/2011	0.8	Spoke with Class Member; created engagement letter.	SCB	\$240	\$192
4/14/2011	0.2	Updated PA and case diary.	SCB	\$240	\$48
4/16/2011	0.1	Emailed with JGB re: next step.	SCB	\$240	\$24
4/19/2011	2.1	Sorted emails; put in phone notes from last week's calls; read through article re: new IJL policy; emailed with class members re: engagement letters and other issues.	SCB	\$240	\$504
4/20/2011	0.9	Spoke to class member re: experience; emailed her re: same; read through email from JLN; read through thunderbird folder.	SCB	\$240	\$216
4/21/2011	3.3	Spoke to class member; created engagement letters for two class members; emailed them re: same; updated class member spread sheet.	SCB	\$240	\$792
4/22/2011	0.3	Updated PA and the case diary.	SCB	\$240	\$72
4/25/2011	3.2	Emailed with class members; saved engagement letter; updated the class member contact information and phone notes in PA; left vmail for class member.	SCB	\$240	\$768
4/26/2011	0.2	Read through Google alerts article.	SCB	\$240	\$48
4/27/2011	0.6	Spoke to class member re: experiences.	SCB	\$240	\$144
4/28/2011	1.3	Reviewed Chung contract; created engagement letter for Chung; emailed with her re: same.	SCB	\$240	\$312
4/29/2011	0.2	Emails re: class member privacy with SCB	BJP	\$310	\$62

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/29/2011	1.2	Monthly tune-up; updated sum doc.	SCB	\$240	\$288
5/2/2011	0.3	Edited invoice; reviewed emails from class members; sorted emails.	SCB	\$240	\$72
5/4/2011	0.5	Put in phone note; emailed with class member; read through emails to case team.	SCB	\$240	\$120
5/5/2011	0.8	Emailed with class member; spoke with JLN re: status of case; updated class member spread sheet.	SCB	\$240	\$192
5/6/2011	1.1	Emailed with class member; listened to vmail from class member and emailed her re: engagement letter; update case diary and PA.	SCB	\$240	\$264
5/10/2011	1.8	Worked on sum doc.	SCB	\$240	\$432
5/11/2011	2.3	Worked on sum doc; emailed with JLN re: new class member; reviewed class member's contract; emailed with JLN re: AODs.	SCB	\$240	\$552
5/12/2011	2.1	Emailed with class member; updated class member information; reviewed class member's contract; reviewed assurances of discontinuance to determine how they apply to current class member's case.	SCB	\$240	\$504
5/13/2011	2.3	Read through motion to intervene fully-briefed motion; updated case diary.	SCB	\$240	\$552
5/16/2011	2.6	Emailed with class member; updated class member list; searched online for new complaints about IJL.	SCB	\$240	\$624
5/17/2011	0.9	Phone call with class member; sorted emails; updated class member list.	SCB	\$240	\$216
5/20/2011	1.7	Reviewed IPRs for Fox and Stein to determine next steps re: pending motions; emailed with potential class member; updated class member list.	SCB	\$240	\$408

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/23/2011	0.3	Spoke to JLN's assistant re: template of document; searched for document and emailed to her.	SCB	\$240	\$72
5/25/2011	0.8	Reviewed IJL's PA folder to determine any projects for apprentices that could be useful for the matter.	SCB	\$240	\$192
5/26/2011	0.2	Read through email from class member.	SCB	\$240	\$48
5/27/2011	1.4	Tried calling class member again; emailed with class member re: BBB complaint; emailed JLN re: same; updated class member list with new information; updated case diary and sum doc.	SCB	\$240	\$336
5/31/2011	1.2	Monthly tune-up; emailed with class members; sorted emails.	SCB	\$240	\$288
6/1/2011	0.9	Emailed with class members as follow up to monthly tune-up; coordinated phone call with class members; sorted emails.	SCB	\$240	\$216
6/2/2011	2.8	Emailed with class member; spoke to class member on phone to discuss experience with IJL; reviewed complaints boards.	SCB	\$240	\$672
6/3/2011	1.2	Created engagement letter for Emily Swilling; emailed with class member re: same; emailed with Priya Mohindra re: BBB complaint; updated case diary.	SCB	\$240	\$288
6/6/2011	3.6	Emailed with class members re: engagement letter and status of case; sorted emails; updated class member spreadsheet; began working on transition memo.	SCB	\$240	\$864
6/7/2011	3.2	Emailed with Emily Swilling re: engagement letter; researched class action engagement letter language; discussed same with other analysts; set up phone call with other class member; reviewed documents sent over to prep for call.	SCB	\$240	\$768
6/8/2011	0.1	Emailed with SCB re: case assignment.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/8/2011	2.9	Reviewed Muskeni docs; spoke to Muskeni on the phone re: experience; saved docs in PA; sorted emails.	SCB	\$240	\$696
6/13/2011	3.8	Read sum docs & complaint for It's Just Lunch.	JSH	\$210	\$798
6/14/2011	0.9	Read supplemental declaration for IJL	JSH	\$210	\$189
6/16/2011	1.2	Phone call with Joanna Robertson, potential IJL class member; then wrote up extensive PN	JSH	\$210	\$252
6/16/2011	0.8	Prepped for phone call with JSH; phone call with Joanna Robertson (class member); discussed same with JSH.	SCB	\$240	\$192
6/20/2011	0.1	Reviewed engagement letter signature page from Emily Swilling.	SCB	\$240	\$24
6/23/2011	1.3	Emailed with case team re: meeting; put in phone notes for previous phone calls.	SCB	\$240	\$312
6/24/2011	1.3	Emailed with potential class member re: phone call; updated PA and case diaries; worked on transition memo.	SCB	\$240	\$312
6/27/2011	0.2	Read through emails from JGB to JLN re: lunch.	SCB	\$240	\$48
6/27/2011	0.3	Made several phone calls to potential IJL class member Warner; left VMs and wrote PN	JSH	\$210	\$63
6/29/2011	1.9	Discussed monthly case tune-up with JSH; attempted to print off address book for same; sorted emails; created list of questions for JSH to use when speaking to class members.	SCB	\$240	\$456
6/29/2011	1.7	Spoke with class member Sharyn Warner on the phone and wrote phone note; updated excel contact sheet; created class member email address book; drafted monthly update to send 6/30	JSH	\$210	\$357
6/30/2011	0.4	Monthly tune-up	JSH	\$210	\$84

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/1/2011	0.4	Updated case diaries and PA; reviewed and edited June invoice	JSH	\$210	\$84
7/5/2011	1.4	Spoke with potential class member Ruvinsky about her experience with IJL; drafted PN of the conversation and engagement letter	JSH	\$210	\$294
7/5/2011	0.4	Made PN of VM to JGB from potential IJL class member; called her back and left a VM	JSH	\$210	\$84
7/6/2011	0.4	Sent updated engagement letter to Mindy Ruvinsky and saved her contact info in Excel spreadsheet	JSH	\$210	\$84
7/8/2011	0.2	Updated PA and summ docs	JSH	\$210	\$42
7/11/2011	0.3	Set up a Google alert for "It's Just Lunch" and created a procedures memo on setting up these alerts	JSH	\$210	\$63
7/13/2011	0.1	Sent interrog verifications to liaison counsel	JSH	\$210	\$21
7/18/2011	1.8	Spoke on the phone with potential class member Sarah Schaufler; reached out to another potential class member to set up a phone call and drafted engagement letter for Schaufler; emailed back and forth with JLN.	JSH	\$210	\$378
7/19/2011	0.8	Drafted, had MJN review, and sent engagement letter to Sarah Schaufler; PA saved documents from Laura Jacob and set up phone call with her for Thursday morning	JSH	\$210	\$168
7/21/2011	1.6	Spoke with potential IJL class member on the phone; drafted and sent engagement letter	JSH	\$210	\$336
8/10/2011	0.3	Emailed back and forth with IJL client Warner re: removal from class member list; removed Warner from Excel sheet and email list	JSH	\$210	\$63
8/19/2011	0.2	Updated case diaries, summ docs and next step/event	JSH	\$210	\$42

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/19/2011	2.4	Reviewed court files in PA system to ensure proper titles, coding, and dates for each document.	CYC	\$205	\$492
8/22/2011	2.2	Reviewed documents in PA system to determine whether they should be coded as a court filed document. Also ensured each court filed document had the appropriate date and title labels.	CYC	\$205	\$451
9/16/2011	0.1	Updated PA	JSH	\$210	\$21
9/22/2011	1.3	Emailed back and forth with potential IJL class member; drafted engagement letter and sent to MJN for review	JSH	\$210	\$273
9/23/2011	0.1	Call with potential class member.	NT	\$210	\$21
10/14/2011	0.1	Updated summ doc & PN calls	JSH	\$235	\$24
10/17/2011	0.1	PN calls for JGB	JSH	\$235	\$24
10/24/2011	1.2	Discussed matter with co-counsel	JGB	\$690	\$828
10/24/2011	0.2	Reached out to potential IJL class member	JSH	\$235	\$47
10/25/2011	0.1	Reviewed billing expenses	JSH	\$235	\$24
10/26/2011	0.3	Emailed back and forth with potential class member	JSH	\$235	\$71
10/28/2011	0.2	Monthly update and sent engagement letter	JSH	\$235	\$47
10/31/2011	1.2	Cleaned file room; updated discovery box	WCE	\$235	\$282
11/2/2011	0.3	PN and emails with Deborah Fulton at Fox	JGB	\$690	\$207
11/2/2011	0.1	Phone Note	JSH	\$235	\$24
11/7/2011	1.4	Reviewed PACER for 2/25 filing; met with JGB re: declaration filing; emailed co-counsel re: filing; document organization	JSH	\$235	\$329
11/9/2011	0.3	Emailed w/ JGB re 2/25 filing	JSH	\$235	\$71

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/10/2011	1.1	Reviewed documents in PACER; emailed liaison counsel re: filings; reviewed filings and renamed in PA	JSH	\$235	\$259
11/15/2011	0.4	Entered PNs for JGB re: scheduling interview; emailed w/ MJN re: prep for interview	JSH	\$235	\$94
11/16/2011	1.7	Set up interview; interview w. Fox & JGB	JSH	\$235	\$400
11/18/2011	0.3	Friday updates and emailed with potential class member	JSH	\$235	\$71
11/21/2011	0.3	Emailed back and forth with potential class member	JSH	\$235	\$71
11/22/2011	0.3	Emailed back and forth w/ potential class member; PA updates	JSH	\$235	\$71
11/28/2011	0.3	Scanned and saved engagement letter; emailed client	JSH	\$235	\$71
11/30/2011	0.4	Emailed back and forth with MJN and JGB; emailed class members re: monthly update	JSH	\$235	\$94
12/2/2011	0.1	Friday updates, invoice and billing review	JSH	\$235	\$24
12/22/2011	0.1	Monthly tune-ups	JSH	\$235	\$24
12/31/2011	2.4	Reviewed deposition transcript of Michelle LePage; took notes re: same	JLN	\$520	\$1,248
1/2/2012	0.1	Review case status	JGB	\$690	\$69
1/4/2012	0.1	Reviewed invoices	JSH	\$235	\$24
1/6/2012	0.1	Friday updates.	JSH	\$235	\$24
1/13/2012	0.1	Friday updates.	JSH	\$235	\$24
1/17/2012	0.2	Emails between JGB and Fox reporter; added PN.	JSH	\$235	\$47
2/1/2012	0.1	Discussed potential interview with JGB.	JSH	\$235	\$24

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/15/2012	1.7	Emailed back and forth with JSH and potential IJL clients; discuss matters with new clients	JGB	\$690	\$1,173
2/15/2012	2.4	Coordinated with potential IJL new clients; drafted, edited and sent blog piece to MJN re: Fox 5 piece; tweeted to blog entry; called potential IJL clients; discussed status w/ JGB	JSH	\$235	\$564
2/16/2012	0.3	Friday updates; organized emails to send engagement letters to new clients.	JSH	\$235	\$71
2/21/2012	0.1	Discussed timing of client damages w/ JSH.	JGB	\$690	\$69
2/24/2012	0.2	Emailed back and forth with JSH re: engagement letters.	JGB	\$690	\$138
2/27/2012	0.1	Discussed status of engagement letters w/ JSH	JGB	\$690	\$69
2/27/2012	1.2	Drafted, edited, and sent engagement letters to MJN for review; sent out engagement letters	JSH	\$235	\$282
2/28/2012	0.4	Emailed back and forth with new clients; saved signed engagement letters	JSH	\$235	\$94
2/29/2012	0.6	Monthly updates, including update to summ doc procedural history; saved summ doc to new DB folder; emailed back and forth with clients; reviewed hours	JSH	\$235	\$141
3/2/2012	0.6	Met with JLN and JSH re: status of MSJ and next steps	JGB	\$690	\$414
3/2/2012	0.7	Met with JLN and JGB re: status of case; Friday updates	JSH	\$235	\$165
3/7/2012	0.2	Emailed back and forth with potential new class member	JSH	\$235	\$47
3/12/2012	0.6	Emailed back and forth with JLN re: new client; discussed case with extern and provided docs for her review	JSH	\$235	\$141
3/13/2012	0.2	Emailed back and forth with JGB re: request to email complaint	JSH	\$235	\$47

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/14/2012	0.7	Explained phone calls to extern; emailed extern w/ phone number and info for clients; discussed what to say to potential clients	JSH	\$235	\$165
3/16/2012	0.2	Emailed back and forth with JSH re: letter to Court	JGB	\$690	\$138
3/16/2012	0.4	Emailed back and forth with JGB re: letter to Court; Friday updates; sorted emails w/ potential clients	JSH	\$235	\$94
3/19/2012	0.6	Emailed back and forth with JLN and JGB re: potential letter to Court; emailed new potential class members re: engagement	JSH	\$235	\$141
3/21/2012	0.7	Prepared engagement letters for new potential clients; sent to MJN for review	JSH	\$235	\$165
3/22/2012	0.8	Emailed back and forth with JGB re: documents in JJC office; moved and organized documents from JJC office to back room; emailed engagement letters to potential clients	JSH	\$235	\$188
3/23/2012	0.1	Friday updates	JSH	\$235	\$24
3/27/2012	2.1	Reviewed the complaint, declaration, and brief for the IJL case	JS	\$0	\$0
3/27/2012	0.7	Emailed back and forth with JGB re: email from potential informant; drafted memo for apprentice w/ instructions for document project; instructed apprentice re: doc project and emailed her relevant court files to review	JSH	\$235	\$165
3/28/2012	0.2	Emailed back and forth with JGB and potential informant	JSH	\$235	\$47
3/29/2012	0.3	Reviewed procedures for PA coding	JS	\$0	\$0
3/29/2012	2.3	Reviewed and entered the hard copy document on the IJL case in PA	JS	\$0	\$0
3/29/2012	0.4	Discussed calling class members w/ JS; emailed back and forth with potential client	JSH	\$235	\$94

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/30/2012	0.3	Monthly updates; emailed clients; Friday updates	JSH	\$235	\$71
3/30/2012	0.2	Called an informant of the IJL case	JS	\$0	\$0
4/2/2012	0.5	Scanned and PA saved new eng letters; emailed back and forth with new class member; reviewed invoices and hours	JSH	\$235	\$118
4/3/2012	4.6	Scanned and uploaded hardcopy documents into PA	JS	\$205	\$943
4/3/2012	0.2	Reviewed the procedure memo for PA coding	JS	\$205	\$41
4/5/2012	3.8	Legal research re: tolling rules under Supreme Court case law for class actions	JLN	\$520	\$1,976
4/5/2012	2.6	Legal research re: tolling rules for class actions under New York State law	JLN	\$520	\$1,352
4/5/2012	2.9	Legal research re: tolling rules for class actions under Second Cir. case law	JLN	\$520	\$1,508
4/6/2012	2.7	Legal research re: court's conclusion that breach of contract precludes unjust enrichment claim	JLN	\$520	\$1,404
4/6/2012	2.25	Legal research re: federal rules for intervention & substitution of class plaintiffs	JLN	\$520	\$1,170
4/6/2012	1.3	Reviewed Report & Recommendation re: fraud & GBL Claims; took notes re: same	JLN	\$520	\$676
4/6/2012	1.2	Legal research re: standard of review under R. 72(b) for challenging R & R	JLN	\$520	\$624
4/6/2012	3.9	Legal research re: class action tolling rules for other Fed. Circuits and Districts	JLN	\$520	\$2,028
4/6/2012	0.6	Reviewed Report & Recommendation re: Motion to Intervene; took notes re: same	JLN	\$520	\$312
4/7/2012	3.2	Legal research re: role of absent class members prior to certification	JLN	\$520	\$1,664

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/7/2012	3.4	Legal research fraudulent concealment v. affirmative misrepresentations and viability of such a claim as part of fraud. inducement.	JLN	\$520	\$1,768
4/7/2012	2.6	Legal research re: Rule 15(b) implied consent to amend for claim not specifically plead but nonetheless litigated by parties	JLN	\$520	\$1,352
4/8/2012	2.8	Legal research re: pre-certification mooted of class rep's claims and substitution of new member to serve as lead rep	JLN	\$520	\$1,456
4/8/2012	2.7	Continued legal research re: Rule 15(b) implied consent to amend for claim not specifically plead but nonetheless litigated by parties	JLN	\$520	\$1,404
4/8/2012	2.1	Continued legal research on viability of unjust enrichment claim when underlying contract is determined to be invalid	JLN	\$520	\$1,092
4/9/2012	2.2	Discussed R&R's w/ JSH and emailed back and forth with JLN re: meeting to discuss same; reviewed R&R; review earlier docket entries	JGB	\$690	\$1,518
4/9/2012	1.3	Reviewed, and PA saved R&R's from PACER; discussed w/ JGB; emailed PDF versions to JGB and set up meeting with JLN re: same	JSH	\$235	\$306
4/9/2012	0.9	Began process of incorporating quotes from cases into summary outline	JLN	\$520	\$468
4/9/2012	3.25	Highlighted & selected quotes from volume 1 of research (compilation of case law relevant to motion)	JLN	\$520	\$1,690
4/9/2012	4	Continued highlighting & selecting quotes from Vol. I research	JLN	\$520	\$2,080
4/9/2012	1.25	Drafted bullet point summary outline of all points (point headings and subheadings) expected to be raised in opposition motion based on legal research	JLN	\$520	\$650

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/10/2012	0.6	Discussed R&R's with JSH; met w/ JLN and JSH to discuss strategy moving forward -- class cert motions, R&R's, motion to intervene, etc.	JGB	\$690	\$414
4/10/2012	3.1	Continued filing hard copy documents in PA for the IJL case	JS	\$205	\$636
4/10/2012	3.8	Continued incorporating quotes from cases into each section & subsection of summary outline	JLN	\$520	\$1,976
4/10/2012	2.4	Finished incorporating quotes from cases into all sections of summary outline	JLN	\$520	\$1,248
4/10/2012	3.1	Started same process for objections to R & R re: denial of Berkowitz's motion to intervene	JLN	\$520	\$1,612
4/10/2012	1.2	Met w/ JGB re: R&R's; reviewed R&R's; met with JLN and JGB re: same; discussed oppositions and set timetable for same	JSH	\$235	\$282
4/11/2012	2.8	Finished comprehensive outline for objections to Berkowitz intervention	JLN	\$520	\$1,456
4/11/2012	1.9	Drafted preliminary statement objections to denial of 349 R & R	JLN	\$520	\$988
4/11/2012	3.6	Began drafting section of brief summarizing objections to R & R's dismissal of 349 claim unjust enrichment claims	JLN	\$520	\$1,872
4/11/2012	1.8	Finished summary of section of brief re: objections to R & R's dismissal of NY claims	JLN	\$520	\$936
4/12/2012	0.2	Friday updates	JSH	\$235	\$47
4/12/2012	2.1	Began working on fraudulent concealment section of brief (re: defendants on notice of this claim from allegations in complaint.)	JLN	\$520	\$1,092
4/12/2012	4.25	Began drafting section of brief re: tolling for absent class members upon filing of class action	JLN	\$520	\$2,210
4/12/2012	3.8	Continued working on tolling rule section for class actions & impact on GBL 349 claim	JLN	\$520	\$1,976

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/12/2012	3.7	Finished working on tolling rule section of brief & impact on GBL 349 claim	JLN	\$520	\$1,924
4/13/2012	3.9	Cont'd working on fraud. concealment section of brief (re: relationship b/w fraudulent omission and fraudulent inducement)	JLN	\$520	\$2,028
4/13/2012	2.4	Started working on Rule 15(b) implied consent argument	JLN	\$520	\$1,248
4/13/2012	4.25	Cont'd working on fraudulent concealment section of brief (re: no prejudice b/c parties litigated issue exhaustively during discov.)	JLN	\$520	\$2,210
4/14/2012	4.2	Started drafting section re: evid. in record to support fraudulent inducement claim	JLN	\$520	\$2,184
4/14/2012	0.9	Drafted section re: frustration of judicial economy	JLN	\$520	\$468
4/14/2012	3.3	Finished working on Rule 15(b) implied consent section	JLN	\$520	\$1,716
4/14/2012	2.2	Drafted section of brief re: lack of prejudice to defs	JLN	\$520	\$1,144
4/15/2012	4.4	Drafted section re: unjust enrichment & viability of claim where K is ruled illegal	JLN	\$520	\$2,288
4/15/2012	4.2	Made edits, revisions, deletions & additions to brief; finalized	JLN	\$520	\$2,184
4/15/2012	3.1	Finished section re: evidence of fraudulent inducement in the record	JLN	\$520	\$1,612
4/16/2012	0.1	Discussed status of motion memo with JSH	JGB	\$690	\$69
4/16/2012	2.8	Emailed back and forth w/ JLN to put together schedule for objections to R+R; researched relevant rules w/ SDNY; drafted motion memo for objections to R+R; emailed back and forth with potential new class members; discussed status w/ JGB	JSH	\$235	\$658

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/16/2012	3.2	Finished sections re: Sct. tolling rules & passive role of absent members	JLN	\$520	\$1,664
4/16/2012	1.9	Drafted section summarizing objections to Berkowitz R & R	JLN	\$520	\$988
4/16/2012	4.4	Started drafting section re: Report's failure to address S.Ct. tolling rules for class action	JLN	\$520	\$2,288
4/16/2012	2.6	Started drafting section re: passive role of absent class members	JLN	\$520	\$1,352
4/16/2012	1.4	Drafted preliminary statement for objections to Berkowitz R & R	JLN	\$520	\$728
4/17/2012	1.1	Discussed status of R+R w/ JSH; review motion memo and R&R	JGB	\$690	\$759
4/17/2012	2.2	Drafted motion memo re: objections to R&R; reviewed R&R's for summary in motion memo; emailed memo to JLN; called Court re: procedure and formatting for objections to R&R	JSH	\$235	\$517
4/17/2012	4.9	Scanned hard copy documents for the IJL case in PA	JS	\$205	\$1,005
4/17/2012	2.4	Drafted section re: fundamental unfairness to absent NY class members if motion to intervene is denied	JLN	\$520	\$1,248
4/17/2012	4.6	Made multiple revisions, edits, & deletions to objections to Berkowitz R & R; finalized brief	JLN	\$520	\$2,392
4/17/2012	3.8	Drafted section in objections to Berkowitz R & R re: public policy goals of class actions	JLN	\$520	\$1,976
4/18/2012	1.4	Emailed back and forth with JLN re: status of R+R objections; review and edit R&R response	JGB	\$690	\$966
4/18/2012	5.6	Read and reviewed MSJ papers and MTI papers; emailed back and forth with JLN and JGB re: objection briefs; reviewed draft of MTI objections and began re-formatting for filing	JSH	\$235	\$1,316

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/18/2012	2.1	Finished scanning hard copy documents for the IJL case in PA	JS	\$205	\$431
4/19/2012	0.7	Edited R&R objections; emailed back and forth with JLN and JSH re: same	JGB	\$690	\$483
4/19/2012	6.8	Formatted, edited, and researched MTI objections to R+R; emailed back and forth with JGB and JLN re: same; began re-formatting and editing objections to MSJ R+R	JSH	\$235	\$1,598
4/20/2012	0.4	Emailed back and forth with JSH and JLN re: objections to R+Rs	JGB	\$690	\$276
4/20/2012	1.1	Review and edit R&R objections.	JLM	\$295	\$325
4/20/2012	0.6	Submitted the documents to the court	JS	\$205	\$123
4/20/2012	1.9	Assisted JSH with preparing court documents for the IJL case	JS	\$205	\$390
4/20/2012	7.6	Revised, formatted, and line edited MTI objections; revised, formatted, and line edited MSJ objections; checked case citations; discussed briefs w/ JLN and JLM; wrote trans letters to Court and OC re: filing; discussed service w/ JS; filed briefs, served email copy on OC; PA saved all EEC documents	JSH	\$235	\$1,786
4/20/2012	1.1	Finished Brief re: Objections to Report and Recommendation on GBL Claims	JLN	\$520	\$572
4/20/2012	9.1	Finished draft of Plaintiffs' Objections to R&R re: intervention	JLN	\$520	\$4,732
4/23/2012	0.6	Emailed back and forth with JLN and discussed letter to Court w/ JSH	JGB	\$690	\$414

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/23/2012	3.2	Drafted and emailed engagement letters to potential class members; emailed re: same w/ MJN; received filing from OC re: objections to R+R; discussed same w/ JGB and JLN; drafted letter to Court re: filing out of time; reviewed FRCP rules and R+R's; sent letter draft back and forth with JGB; faxed to Court	JSH	\$235	\$752
4/24/2012	1.6	Discussed amended cert. of service w/ JSH; emailed back and forth with JLN and JSH re: letter to Court responding to D's letter to Court; reviewed objections	JGB	\$690	\$1,104
4/24/2012	4.3	Received returned copy of objections to R+R; discussed filing with JGB; drafted, filed and served amended cert. of service; printed and read D's objections to MSJ R+R; began drafting motion memo re: same; reviewed and PA saved exhibits to D's objections to MSJ R+R	JSH	\$235	\$1,011
4/24/2012	0.2	Discussed with JSH re: creating IJL court file binder	JS	\$205	\$41
4/27/2012	0.3	Friday and monthly updates	JSH	\$235	\$71
4/30/2012	0.3	Emailed back and forth with JSH and JLN re: response to objections	JGB	\$690	\$207
4/30/2012	0.6	Emailed back and forth with JGB and JLN re: scheduling of response to R+R opposition	JSH	\$235	\$141
5/1/2012	0.4	Drafted engagement letters for potential new class members; added email addresses to class member list	JSH	\$235	\$94
5/2/2012	0.3	Emailed back and forth with potential clients; updated engagement letters	JSH	\$235	\$71
5/3/2012	0.2	Emailed back and forth with JSH re: status of response to objections to R+R	JGB	\$690	\$138
5/3/2012	0.4	Drafted engagement letters and sent to MJN for review; emailed back and forth w/ JGB re: status and timing of Monday filing	JSH	\$235	\$94

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/4/2012	0.8	Emailed back and forth with case team re: response to R+R objections; sent several engagement letters to new clients; Friday updates	JSH	\$235	\$188
5/7/2012	0.6	Edited and reviewed response to objections	JGB	\$690	\$414
5/7/2012	8.2	Formatted, edited and revised response to D's obj to MSJ R+R; emailed back and forth with JGB re: edits; line edited brief and had WCE and NT line edit; checked citations; drafted TOA and TOC; emailed back and forth with JLN re: motion and printed for JLN review; drafted cert. of service; filed brief and served on OC via email	JSH	\$235	\$1,927
5/7/2012	0.8	Line edits to brief.	WCE	\$235	\$188
5/8/2012	0.1	Emailed JSH re: refiling document	JGB	\$690	\$69
5/8/2012	0.9	Reviewed Defendant's Response to Objection to Report and Recommendations	JLN	\$520	\$468
5/8/2012	1.2	Gave JAH instructions for printing/delivering hard copy of filing to Court; refiled brief per Court instructions; drafted trans letter for filing with Court; emailed back and forth with client	JSH	\$235	\$282
5/9/2012	0.2	Discussed response filing with JSH	JGB	\$690	\$138
5/9/2012	0.2	Discussed filing from Monday with JGB	JSH	\$235	\$47
5/10/2012	0.1	Discussed plans for Motion for Class Cert with JSH	JGB	\$690	\$69
5/10/2012	0.2	Discussed schedule for motion for class cert with JGB	JSH	\$235	\$47
5/11/2012	0.2	Friday updates	JSH	\$235	\$47
5/17/2012	0.2	Friday updates	JSH	\$235	\$47
5/20/2012	0.1	Discussed plans for motion for class cert w/ JSH	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/21/2012	0.2	Emailed back and forth with new prospective clients	JSH	\$235	\$47
5/22/2012	0.1	Discussed motion for class cert with JSH	JGB	\$690	\$69
5/22/2012	3.2	Discussed beginning class cert motion with JGB; reviewed drafts of motions from earlier in case; began drafting class cert motion; reviewed opp to MSJ from 2011; emailed back and forth with potential new class members	JSH	\$235	\$752
5/23/2012	0.1	Discussed class cert motion with JSH	JGB	\$690	\$69
5/23/2012	3.4	Drafted motion for class cert; reviewed old draft of motion as well as opposition to MSJ; identified and reviewed Berkowitz affirmation; sent draft of motion to JGB for review	JSH	\$235	\$799
5/24/2012	0.1	Emailed JSH re: status of edits/motion	JGB	\$690	\$69
5/24/2012	0.4	Email w JGB re: status of class cert motion; reviewed draft	JSH	\$235	\$94
5/29/2012	0.2	Reviewed e-mails from class members, reviewed case documents	TFM	\$235	\$47
5/30/2012	1.2	Reviewed summary document; created and edited engagement letters, e-mails with MJN and potential clients re: letters	TFM	\$235	\$282
5/31/2012	1.6	Monthly tune-up, case review	TFM	\$235	\$376
5/31/2012	0.8	Review class cert draft	JGB	\$690	\$552
6/1/2012	0.1	E-mails with TFM re: client email	JGB	\$690	\$69
6/1/2012	0.1	Weekly update, reviewed May invoices	TFM	\$235	\$24
6/7/2012	0.3	Reviewed documents on CDs, determined if in PA or not	TFM	\$235	\$71
6/11/2012	0.1	Reviewed engagement letter from client	TFM	\$235	\$24
6/14/2012	0.1	E-mail to MY re: motion for class cert	TFM	\$235	\$24

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/14/2012	3.4	Review class cert documents	MY	\$265	\$901
6/15/2012	3.2	Reviewed relevant motions papers and court orders	MY	\$265	\$848
6/18/2012	5.7	Reviewed SumDoc and previous court documents for background on case. Reviewed sample class cert. motions and current draft	MY	\$265	\$1,511
6/26/2012	1.1	E-mail to TFM re: potential client response; initial review of class cert brief	JGB	\$690	\$759
6/28/2012	0.2	E-mail to potential client re: questions, drafted engagement letter, e-mailed to client	TFM	\$235	\$47
6/29/2012	0.1	E-mails with class member re: class size	TFM	\$235	\$24
6/29/2012	0.2	Monthly tune-up	TFM	\$235	\$47
6/29/2012	3.8	Revised Class Cert	MY	\$265	\$1,007
7/6/2012	0.1	E-mails with TFM and MJN re: engagement letter	JGB	\$690	\$69
7/9/2012	0.2	E-mails with potential client re: case status, reviewed her e-mail	TFM	\$235	\$47
7/25/2012	2.9	Researched class certifications by Judge Stein and revised class certification draft	MY	\$265	\$769
7/26/2012	6.9	Rewrite draft for motion for class cert.	MY	\$265	\$1,829
7/27/2012	0.1	Completed monthly tune-up; weekly case update	TFM	\$235	\$24
7/27/2012	2.8	Helped with class action research.	NGR	\$205	\$574
7/27/2012	7.6	Rewrite Motion for Class Cert. argument section	MY	\$265	\$2,014
7/27/2012	1.7	Assisted MY in class cert. research	MMG	\$265	\$451
7/27/2012	0.8	Research on 23(b)(3).	MMG	\$265	\$212
7/30/2012	3.3	Rewrite Facts and Preliminary Statement for Motion for Class Certification	MY	\$265	\$875

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/31/2012	4.3	Reformatted and revised class cert. Line edited draft	MY	\$265	\$1,140
8/1/2012	2	Finalized draft motion for class certification and emailed to JLN for review	MY	\$265	\$530
8/1/2012	0.1	Reviewed invoice.	NT	\$235	\$24
8/2/2012	0.8	Created Case Cheat Sheet on Judge Stein's Recent Cert Decision	MY	\$265	\$212
8/3/2012	2	Finished cheat sheet of Judge Stein's recent cert decisions	MY	\$265	\$530
8/6/2012	0.3	Reviewed and responded to e-mails from potential class action members	TFM	\$235	\$71
8/7/2012	0.3	E-mails with potential clients, drafted engagement letter and e-mailed to potential client	TFM	\$235	\$71
8/7/2012	0.1	E-mails with potential client and TFM re: client	JGB	\$690	\$69
8/8/2012	0.1	Discussed call with potential client with TFM	JGB	\$690	\$69
8/8/2012	1.2	Prep for and call with potential client, e-mails with potential client, reviewed contract with IJL; discussed same with JGB	TFM	\$235	\$282
8/9/2012	0.3	Updates to court binders.	WCE	\$235	\$71
8/9/2012	0.1	E-mailed JGB re: contract	TFM	\$235	\$24
8/10/2012	0.1	Weekly case update	TFM	\$235	\$24
8/13/2012	0.2	Reviewed e-mails between potential client and JGB	TFM	\$235	\$47
8/14/2012	0.1	E-mails with potential client	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/15/2012	0.3	E-mails with potential clients and MJN re: engagement, drafted engagement letter, e-mailed to potential client; e-mail to JLN re: Yahoo group	TFM	\$235	\$71
8/16/2012	0.2	E-mails with potential client; drafted engagement letter, e-mailed to potential client	TFM	\$235	\$47
8/17/2012	0.1	Weekly case update	TFM	\$235	\$24
8/23/2012	0.1	Reviewed August invoice	TFM	\$235	\$24
8/24/2012	0.1	E-mail to email account re: speaking with administrator	TFM	\$235	\$24
9/4/2012	0.1	Discussed case with NST.	TFM	\$235	\$24
9/4/2012	0.1	Briefed NST with case details and how to proceed.	JGB	\$690	\$69
9/4/2012	1.1	Discussed case with JGB, reviewed pleadings and summary document to catch up on case.	NST	\$235	\$259
9/5/2012	0.1	Discussed class member email list with NST; discussed task with NST.	TFM	\$235	\$24
9/5/2012	4	Transcribed class email addresses to address book, sent monthly update, and researched the facts of the case.	NST	\$235	\$940
9/25/2012	0.1	Emailed class member.	JGB	\$690	\$69
9/27/2012	0.2	Emailed class members.	NST	\$235	\$47
9/28/2012	1.1	Sorted emails, responded to class members, and updated sum doc.	NST	\$235	\$259
10/4/2012	0.4	Communication with clients.	NST	\$245	\$98
10/5/2012	0.4	Client Communication.	NST	\$245	\$98
10/9/2012	0.2	Communication with class member.	NST	\$245	\$49
10/10/2012	0.1	Advised NST on client communication.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/10/2012	0.6	Correspondence with clients.	NST	\$245	\$147
10/11/2012	1.4	Communication with clients and drafted and sent three engagement letters to potential class members.	NST	\$245	\$343
10/12/2012	1.2	Created two engagement letters and discussed case with potential class members.	NST	\$245	\$294
10/12/2012	0.1	Email with NST on client relations.	JGB	\$690	\$69
10/16/2012	0.6	Drafted and sent engagement Letters to two potential clients.	NST	\$245	\$147
10/17/2012	0.8	Edited engagement letters and sent them to potential class members. Continued communication with clients.	NST	\$245	\$196
11/2/2012	0.2	Received PN and called back potential client to join class. Left voicemail.	NST	\$245	\$49
11/4/2012	0.6	Monthly updates sent to clients, updated summ doc, and phone noted missed calls and voicemails from clients.	NST	\$245	\$147
11/4/2012	0.1	Reviewed invoice.	NT	\$285	\$29
11/7/2012	0.2	Client communication	NST	\$245	\$49
11/9/2012	0.2	Completed Friday updates and communicated with a potential class member.	NST	\$245	\$49
11/9/2012	0.2	Talked to potential class member; emailed NST to follow up with client.	JGB	\$690	\$138
11/14/2012	0.1	PA saved engagement letter; emailed new client	NST	\$245	\$25
11/16/2012	0.1	Updated summary document and next events.	NST	\$245	\$25
11/30/2012	1.3	Reviewed case material; performed weekly and monthly updates	AJW	\$245	\$319

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/7/2012	2.1	Reviewed case material and drafted a talking point script; updated excel sheet with class members	AJW	\$245	\$515
12/10/2012	1.4	Called potential class member regarding her experience; updated potential class member talking script; update excel and email lists	AJW	\$245	\$343
12/13/2012	0.4	Spoke with JGB re: assignment to this matter; discussed background details of case with WCE.	KPK	\$245	\$98
12/17/2012	0.1	Reviewed email to potential class member	JGB	\$690	\$69
12/17/2012	0.4	E-mail to potential class member	AJW	\$245	\$98
12/18/2012	1.4	PA saving documents; e-mailed potential class members	AJW	\$245	\$343
12/19/2012	0.2	Added class member to excel list; emailed potential class member	AJW	\$245	\$49
12/20/2012	0.2	Monthly Tune-Up	AJW	\$245	\$49
1/10/2013	0.2	Discussed with AJW how to deal with potential clients	JGB	\$690	\$138
1/10/2013	0.6	E-mailed potential client re: sending complaint	AJW	\$245	\$147
1/11/2013	0.1	Weekly update	AJW	\$245	\$25
2/4/2013	0.2	Discussed e-mails regarding potential class members with AJW	JGB	\$690	\$138
2/4/2013	0.8	E-mailed prospective class member; discussed with JGB how to respond to e-mail	AJW	\$245	\$196
2/28/2013	0.3	Monthly review of documents, filings, contacts, and other summary and general case information.	AJW	\$245	\$74
3/7/2013	0.1	Discuss with AJW how to respond to e-mail	JGB	\$690	\$69
3/7/2013	1.1	Responded to potential class member emails	AJW	\$245	\$270
3/19/2013	0.1	E-mailed potential class member	TFM	\$285	\$29

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/19/2013	0.4	E-mail to putative class member; update excel list	AJW	\$245	\$98
3/29/2013	0.4	Review case filings re: case status; discuss next possible steps with outside counsel	JGB	\$690	\$276
4/4/2013	0.6	Respond to potential class member e-mails; add names to putative class list	AJW	\$245	\$147
4/23/2013	0.2	E-mail exchange with JB regarding Judge Stein's Memorandum and Order adopting Judge Fox's recommendations in part, rejecting in part	JLN	\$520	\$104
4/23/2013	1.1	Reviewed Memorandum and Order adopting in part Report and Recommendations for 155 Report and Recommendations, 156 Report and Recommendations; took notes re: same	JLN	\$520	\$572
4/24/2013	0.6	Edit the TAC and send to JGB for review	AJW	\$245	\$147
4/25/2013	0.8	Discussions with case team via email re next steps, TAC, and responding to notice of appeal	JGB	\$690	\$552
4/25/2013	0.1	Meet with AJW re: next steps.	KK	\$355	\$36
4/25/2013	0.1	Reviewed Notice of Appeal from Order Adopting Report and Recommendations	JLN	\$520	\$52
4/25/2013	0.2	E-mail exchange with Andrew Wolfram & JB regarding draft TAC	JLN	\$520	\$104
4/25/2013	0.2	Received Appeal Record sent to USCA	JLN	\$520	\$104
4/26/2013	0.4	Review and edit TAC; discuss TAC and recent order with co-counsel and case team	JGB	\$690	\$276
4/26/2013	1.8	Discuss changes to TAC with case team; make edits and send to client for review	AJW	\$245	\$441
4/29/2013	1.3	Discuss edits to TAC with co-counsel and AJW; discuss filing with AJW; follow up with JLN re: next steps; review case history	JGB	\$690	\$897
4/29/2013	0.2	Reviewed Third Amended Complaint	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/29/2013	0.2	Emails re: deadline for adding Berkowitz	JLN	\$520	\$104
4/29/2013	1.8	Call lead plaintiff to ask him about the facts of the case; discuss edits with JGB and co-counsel; file complaint	AJW	\$245	\$441
5/1/2013	2.1	Meeting with co-counsel on case re next steps and our schedule; review order and appeal papers	JGB	\$690	\$1,449
5/1/2013	0.7	Meeting with co-counsel to discuss schedule going forward; called court to make sure PDF version of TAC received	AJW	\$245	\$172
5/3/2013	0.1	E-mail case team regarding outstanding discovery; e-mail co-counsel regarding potential California plaintiff	JGB	\$690	\$69
5/6/2013	0.9	Follow up letter to new client	JHK	\$245	\$221
5/6/2013	0.8	Researched prior decisions from Judge Stein re: motions for reconsideration	JLN	\$520	\$416
5/6/2013	2.1	Researched case law re: standards for interlocutory appeal under 1292(b)	JLN	\$520	\$1,092
5/6/2013	0.1	Reviewed Notice of Appearance by Peter T. Shapiro	JLN	\$520	\$52
5/6/2013	0.8	Reviewed Memorandum of Law in Support Motion for Reconsideration	JLN	\$520	\$416
5/6/2013	2.6	Researched case law cited by defendants in their motion for reconsideration	JLN	\$520	\$1,352
5/6/2013	0.6	Researched current case law for motion for reconsideration stds in SDNY	JLN	\$520	\$312
5/7/2013	0.2	E-mails to co-counsel and case team regarding extension of time for motion to certify class and response to motion for reconsideration	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/7/2013	1.4	Drafted comprehensive outline with headings and subheadings for response to defendants' motion for reconsideration	JLN	\$520	\$728
5/7/2013	2.8	Highlighted research volume re: case law found relative to instant motion; incorporated case law (quotes/holdings) into outline	JLN	\$520	\$1,456
5/7/2013	3.2	Researched case law cited by defendants re: standing requirement for American Pipe tolling	JLN	\$520	\$1,664
5/8/2013	1.2	E-mails to o/c and co-counsel regarding o/c's request for an extended briefing schedule; e-mails to o/c regarding stip and letter to court; review and send back stip	JGB	\$690	\$828
5/8/2013	0.3	Review e-mails between JGB, co-counsel, and o/c re stay and extension of briefing time for motion to reconsider and motion to certify	AJW	\$245	\$74
5/8/2013	2.8	Drafted section distinguishing cases relied upon by defendants	JLN	\$520	\$1,456
5/8/2013	2.7	Continued research on issue of standing (or lack thereof) & potential impact on American Pipe tolling	JLN	\$520	\$1,404
5/8/2013	0.6	Finished working on American Pipe & lack of standing	JLN	\$520	\$312
5/8/2013	2.7	Drafted section re: tolling and public policy arguments for same	JLN	\$520	\$1,404
5/8/2013	3.25	Started working on American Pipe section & defendants' claim re: lack of standing	JLN	\$520	\$1,690
5/8/2013	2.6	Continued working on American Pipe & Constitutional Requirements re: standing	JLN	\$520	\$1,352
5/9/2013	0.4	Reviewing letter to court re motion to reconsider and motion to stay discovery; emailing co-counsel re letter	JGB	\$690	\$276

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/9/2013	3.8	Drafting, editing, and finalizing letter re motion to stay	PGM	\$245	\$931
5/9/2013	0.2	E-mail exchange with JB regarding Klein's motion to stay	JLN	\$520	\$104
5/9/2013	1.9	Drafted sections re: reliance & scienter	JLN	\$520	\$988
5/9/2013	2.6	Drafted section summarizing evidence supporting Court's prior decision re inducement claim	JLN	\$520	\$1,352
5/9/2013	0.2	Reviewed letter from BK re Stay	JLN	\$520	\$104
5/9/2013	2.9	Read Wells Fargo case included by defs. in motion (appendix) & researched case law cited therein	JLN	\$520	\$1,508
5/9/2013	2.8	Researched case law cited by defendants re: unjust enrichment claim & existence of written contract barring such a claim	JLN	\$520	\$1,456
5/9/2013	3.9	Drafted section responding to defendants args. Re: fraudulent inducement	JLN	\$520	\$2,028
5/10/2013	0.7	Drafting, editing, and finalizing letter re motion to stay	PGM	\$245	\$172
5/10/2013	1.4	Review new letters; draft response; discuss with case team next steps; review previous orders	JGB	\$690	\$966
5/10/2013	0.1	E-mail to and from Balestriere re response to letter from def. counsel	JLN	\$520	\$52
5/10/2013	0.1	Reviewed Notice of Stay of Appeal for Notice of Appeal.	JLN	\$520	\$52
5/10/2013	0.1	Reviewed Consent Revised-Scheduling Order	JLN	\$520	\$52
5/10/2013	0.1	Reviewed briefing schedule for class action motion	JLN	\$520	\$52
5/10/2013	0.2	E-mail exchange with JB regarding IJL letter motion to dismiss complaint	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/10/2013	3.2	Researched issue of certification for interlocutory appeal under 1292(b) re: defs. request for same	JLN	\$520	\$1,664
5/10/2013	2.8	Drafted section of brief re: defendants failure to meet standards for interlocutory appeal under Rule 1229(b)	JLN	\$520	\$1,456
5/10/2013	0.2	E-mail exchange with JB regarding standards of stay	JLN	\$520	\$104
5/10/2013	2.4	Drafted section of brief re: unjust enrichment claims	JLN	\$520	\$1,248
5/11/2013	1.8	Researched whether motion for reconsideration & appeal can be litigated simultaneously	JLN	\$520	\$936
5/11/2013	2.7	Researched whether party can raise issue for first time in reconsideration motion when party has failed to objected to prior Report & Recommendation	JLN	\$520	\$1,404
5/11/2013	2.3	Continued final edits on brief	JLN	\$520	\$1,196
5/11/2013	4.6	Made revisions, edits, deletions & additions to draft opp. to reconsideration brief	JLN	\$520	\$2,392
5/12/2013	1.9	Put together statement of facts for opp to reconsideration motion	JLN	\$520	\$988
5/13/2013	1.2	Review and draft letter responding to D's MTD letter; review earlier orders and filings	JGB	\$690	\$828
5/13/2013	1.2	Drafted argument re: defendants' failure to file response to plaintiff's objections to R & R re: dismissal of NY claims & procedural bar for raising arg. for 1st time now	JLN	\$520	\$624
5/13/2013	1.1	Drafting letter re D's letter motion to court; editing letter	PGM	\$245	\$270
5/13/2013	0.1	Call to deputy regarding response time to D's letter motion	PGM	\$245	\$25

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/13/2013	0.2	Briefing on response to letter motion w/ AJW and JGB	PGM	\$245	\$49
5/14/2013	0.2	Line edit for letter to Court re o/c's letter	AJW	\$245	\$49
5/14/2013	1.1	Edits to letter; discuss with case team next steps	JGB	\$690	\$759
5/14/2013	0.1	Meet with PGM regarding next steps.	KK	\$355	\$36
5/14/2013	4.6	Continued working on section re: filing of class action lawsuit tolls SOL for all members	JLN	\$520	\$2,392
5/14/2013	4.2	Began drafting section re: commencement of class action suit suspended SOL for all members	JLN	\$520	\$2,184
5/14/2013	1.7	Editing and finalizing letter re D's motion to dismiss letter to court; transmitting letter to court and parties	PGM	\$245	\$417
5/15/2013	4.1	Continued drafting section re: American Pipe tolling & lack of standing re: original plaintiffs	JLN	\$520	\$2,132
5/15/2013	3.8	Began drafting section re: American Pipe tolling is constitutionally permissible even if original plaintiffs lacked standing	JLN	\$520	\$1,976
5/16/2013	0.4	Editing letter to D re document production; communicating with case team re letter response	JGB	\$690	\$276
5/16/2013	3.8	Drafting letter re responses to discovery requests	PGM	\$245	\$931
5/16/2013	2.4	Finished drafting section re: American Pipe tolling & lack of standing	JLN	\$520	\$1,248
5/16/2013	4.4	Drafted section re: tolling would not undermine purposes of SOL	JLN	\$520	\$2,288
5/16/2013	0.6	Robust Line Edit on doc production, Line edit on letter to opposing counsel	JHK	\$245	\$147
5/17/2013	0.1	Sort, save, and code O/C letter re motion to dismiss into firm's practice management and documents database.	PGM	\$245	\$25

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/17/2013	0.1	Back and forth emails with defense counsel re: their need for old complaint	JGB	\$690	\$69
5/17/2013	3.2	Drafted section re: issues of credibility preclude SJ.	JLN	\$520	\$1,664
5/17/2013	3.4	Began drafting section summarizing evidence in record summarizing evidence in record supporting fraudulent inducement claim	JLN	\$520	\$1,768
5/17/2013	0.1	Reviewed Court's Order re: Defendants' request that the GBL ? 349 claim in the Third Amended Complaint be dismissed for failure to amend the caption is denied	JLN	\$520	\$52
5/17/2013	2.6	Drafted preliminary statement for opp to reconsideration summarizing all of our arguments	JLN	\$520	\$1,352
5/17/2013	1.4	Drafted standard of review section re: defendants' motion for reconsideration	JLN	\$520	\$728
5/18/2013	2.8	Continued drafting section summarizing evidence in record summarizing fraudulent inducement claim	JLN	\$520	\$1,456
5/18/2013	3.6	Finished drafting section summarizing evidence in record summarizing fraudulent inducement claim	JLN	\$520	\$1,872
5/19/2013	2.9	Drafted section re: court's correct ruling on unjust enrichment claim	JLN	\$520	\$1,508
5/19/2013	3.2	Drafted section re: defendants' failure to meet requirements for interlocutory review under R. 1292(b)	JLN	\$520	\$1,664
5/20/2013	1.2	E-mails to AJW regarding discovery obligations and opposition brief to motion for reconsideration; review reconsideration memo	JGB	\$690	\$828
5/20/2013	0.2	Discuss outstanding document demands with JGB and how to follow up with o/c	AJW	\$245	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/20/2013	7.25	Finalized Opposition to Motion for Reconsideration	JLN	\$520	\$3,770
5/20/2013	4.4	Made extensive edits & revisions to draft opposition brief	JLN	\$520	\$2,288
5/20/2013	6.25	Continued making revisions & edits to draft opp. brief	JLN	\$520	\$3,250
5/21/2013	0.2	Reviewed Answer to Third Amended Complaint.	JLN	\$520	\$104
5/22/2013	0.6	Discuss with co-counsel and AJW regarding o/c's response to our letter regarding old document demands; e-mails to and from o/c re same; discuss schedule next week with case team	JGB	\$690	\$414
5/22/2013	0.4	Discuss with JGB e-mail response to o/c regarding document demands; draft e-mail and send	AJW	\$245	\$98
5/22/2013	0.1	Consulting w/ attorney re opposing counsel response to document demands	PGM	\$245	\$25
5/23/2013	1.7	Emails to and from case team; review demands; memo on demands; propose follow up	JGB	\$690	\$1,173
5/23/2013	0.2	Sending D's discovery demands to opposing counsel; saving and sorting demands into firm's file management system.	PGM	\$245	\$49
5/24/2013	0.3	Follow-up w/ potential class member	PGM	\$245	\$74
5/24/2013	1.2	Call from potential class member; emails between case team members re: discovery and class cert; review discovery letters and earlier Berkowitz demands and follow up	JGB	\$690	\$828
5/24/2013	0.2	Review discovery and reconsideration motion status; touch base with case team	JGB	\$690	\$138
5/28/2013	6.7	Editing and checking case law re opposition to motion for reconsideration	PGM	\$245	\$1,642
5/28/2013	2.2	Review and edit reconsideration opposition	JGB	\$690	\$1,518

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/29/2013	2.6	Reviewing D's demands w/ case team; plan next steps; review and edit consideration opposition	JGB	\$690	\$1,794
5/29/2013	4	Read It's Just Lunch (IJL) documents to get fully briefed on the case. Looked at JGB's email about a new task for the case (to be discussed thoroughly on Friday) and re-read over Klein's demands. Discussed matters with both AJW & PGM. Also conducted research into LexisNexis & Westlaw policies regarding student use of accounts for non-academic research.	MYZ	\$265	\$1,060
5/29/2013	7.7	Editing and checking relevant citations and case law for opposition to motion for reconsideration	PGM	\$245	\$1,887
5/29/2013	0.1	Consult w/ case team re D's discovery demands	PGM	\$245	\$25
5/30/2013	2.1	Reviewing and editing opposition to motion for reconsideration and related documents; correspondence with class member; review discovery status; email case team re: status and next steps	JGB	\$690	\$1,449
5/30/2013	0.3	Assist PGM with creating table of authorities for opposition brief	AJW	\$245	\$74
5/30/2013	3	Edited Motion to Reconsider (IJL case) sent by PGM. Tasks included: making sure quotations are correct, case law is on point, new sentence is double-spaced, correct font, correct page cites, grammar, capitalization, Exhibit citations and page numbers are correct/included.	MYZ	\$265	\$795
5/30/2013	1	Met with JGB to discuss the IJL case. Provided 4 tasks: -Read the Summary Judgment Order -Read the Operative Complaint -Draft Class Certification Brief -Line edit the Motion for Reconsideration.	MYZ	\$265	\$265
5/30/2013	7.3	Making final edits and filing Opposition to Motion for Reconsideration	PGM	\$245	\$1,789

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/30/2013	0.7	Reviewed Declaration of John G. Balestriere in Opposition Motion for Reconsideration	JLN	\$520	\$364
5/30/2013	4	Read over JGB's email regarding IJL's Motion to Reconsider (sent by JLN). Then opened the Discovery documents & Motion to Reconsider doc in the PA to get familiarized with the requested info. Researched online more into It's Just Lunch company to get better context and look at new complaints about its service.	MYZ	\$265	\$1,060
5/31/2013	0.7	Preparing and sending copies of documents to court	PGM	\$245	\$172
5/31/2013	0.2	Following up w/ potential class member	PGM	\$245	\$49
5/31/2013	0.2	Sort, save, and code deposition notice into firm's practice management and documents database; transmit deposition notice to co-counsel	PGM	\$245	\$49
5/31/2013	1.7	Communicating w/ potential class member; follow up with case team re: next steps; review production	JGB	\$690	\$1,173
5/31/2013	2.5	Per JGB's instructions: Do more background research on IJL through PA & on Google to get a better context of the case at hand.	MYZ	\$265	\$663
6/1/2013	3.1	Legal research re: standards for numerosity in 2d Circuit	JLN	\$520	\$1,612
6/1/2013	6.25	Started legal research re: overview of requirements for class action under Federal Rules	JLN	\$520	\$3,250
6/2/2013	1.2	Email case team re: discovery and class cert follow up; lay out plan for coming months	JGB	\$690	\$828
6/2/2013	0.9	Reviewed all of IJL's discovery responses to find response where IJL disclosed specific numbers of class members in New York	JLN	\$520	\$468
6/2/2013	4.2	Legal research re: pursuing GBL 394-c violation as class action	JLN	\$520	\$2,184

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/2/2013	4.5	Legal research re: standards for numerosity in other circuits	JLN	\$520	\$2,340
6/3/2013	0.1	Meet with AJW regarding next steps.	KK	\$355	\$36
6/3/2013	1	Started reviewing other cases for Class certification briefs (to get a general overview how it is supposed to be correctly written)	MYZ	\$265	\$265
6/3/2013	0.7	Emails with case team re: deposition and discovery; emails to and from defense counsel re: Berkowitz deposition and general scheduling	JGB	\$690	\$483
6/3/2013	2.8	Legal research re: standards for typicality in other circuits	JLN	\$520	\$1,456
6/3/2013	4.6	Continued research re: typicality standard for class action cert. motion	JLN	\$520	\$2,392
6/3/2013	3.9	Legal research re: standards for typicality per Supreme Court & 2d Circuit case law	JLN	\$520	\$2,028
6/3/2013	1	IJL - Met with KK to discuss case; reviewed the Opposition to D's Motion to Reconsider & Exhibits again to refresh memory for later tasks.	MYZ	\$265	\$265
6/3/2013	0.1	Reviewing class certification motion memo	PGM	\$245	\$25
6/3/2013	0.3	Emailing plaintiff re preparation for deposition	PGM	\$245	\$74
6/3/2013	3	IJL - Per JGB's email: worked on template of motion memo (for class certification brief).	MYZ	\$265	\$795
6/3/2013	2.5	IJL - Per JGB's email: looked through the discovery binder to see what needs updating, reviewed Klein's production on Berkowitz, reviewed Depositions of previous clients in prep for June 10th Berkowitz deposition, discussed case & deadlines with PGM.	MYZ	\$265	\$663
6/3/2013	0.4	Reviewing discovery production	PGM	\$245	\$98
6/3/2013	0.3	Sort, save, and code documents into firm's practice management and documents database.	PGM	\$245	\$74

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/3/2013	0.9	Correspond w/ attorney re deposition; correspond w/ apprentice re motion; updating class re case status	PGM	\$245	\$221
6/4/2013	0.1	Discuss class cert draft with MZ.	JLM	\$355	\$36
6/4/2013	3	IJL - worked on class certification brief: researched to update the cases, shepardized the previous draft.	MYZ	\$265	\$795
6/4/2013	2.9	Legal research re: commonality in other jurisdictions	JLN	\$520	\$1,508
6/4/2013	3.9	Legal research re: Sct. & 2d Cir case law on commonality	JLN	\$520	\$2,028
6/4/2013	4.25	Continued legal research re: commonality; shepardized Dukes & researched other federal cases in this Circuit & others that have cited Dukes	JLN	\$520	\$2,210
6/4/2013	1	IJL - worked on class certification brief: Edited whole document for grammar issues, checked citations.	MYZ	\$265	\$265
6/4/2013	2	IJL - worked on class certification brief: checked against MTD to update the class cert brief.	MYZ	\$265	\$530
6/4/2013	2	IJL - Per JGB's email: edited proc memo, followed up with Brad (worked with PGM on this), updated yesterday's memo.	MYZ	\$265	\$530
6/4/2013	0.6	Responding to questions from class member	PGM	\$245	\$147
6/4/2013	0.4	Consulting w/ apprentice re adequacy of discovery production	PGM	\$245	\$98
6/4/2013	0.2	Phone call w/ potential class member	PGM	\$245	\$49
6/5/2013	1.5	IJL - Reviewed PA system for other docs to make sure class cert brief has the most up to date info, matched exhibits & ensured class certification citations were correct.	MYZ	\$265	\$398

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/5/2013	0.2	Meet with MYZ regarding next steps: class cert. Meet with PGM regarding next steps.	KK	\$355	\$71
6/5/2013	3.1	Legal research re: adequacy of plaintiff & counsel in 2d Cir.	JLN	\$520	\$1,612
6/5/2013	4.6	Legal research re: overview of requirements under Rule 23(b)	JLN	\$520	\$2,392
6/5/2013	2	IJL - worked on class certification brief: lined edited & reviewed document & exhibits once more before sending to JGB.	MYZ	\$265	\$530
6/5/2013	3	IJL - worked on class certification brief: checked citations, verified that caselaw is still good & up to date.	MYZ	\$265	\$795
6/5/2013	5.2	Updating court binders; assembling discovery binders, searching records for discovery correspondence; corresponding w/ plaintiff	PGM	\$245	\$1,274
6/6/2013	1.1	Discuss next steps on discovery demands and deposition schedule w/PGM; review class cert draft	JGB	\$690	\$759
6/6/2013	2.6	Legal research re: predominance requirement for fraud cases in other Circuits	JLN	\$520	\$1,352
6/6/2013	1.25	Research various cases outside circuit re: certification of national fraud class	JLN	\$520	\$650
6/6/2013	5.4	Legal research re: predominance requirement per Sct & 2d Cir.	JLN	\$520	\$2,808
6/6/2013	3.8	Legal research re: predominance requirement for fraud cases	JLN	\$520	\$1,976
6/6/2013	0.1	Discuss deposition schedule and discovery demands w/ attorney	PGM	\$245	\$25
6/6/2013	0.2	Reviewing class cert. brief draft	PGM	\$245	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/6/2013	5.3	Searching records for discovery correspondence; creating discovery binders	PGM	\$245	\$1,299
6/7/2013	1.7	E-mails with case team and co-counsel re upcoming class brief; review brief draft; review American Pipe and related cases	JGB	\$690	\$1,173
6/7/2013	0.3	Review e-mails re next steps in case; discuss schedule for class cert brief with co-counsel	AJW	\$245	\$74
6/7/2013	0.1	Review discovery binder with PGM.	JLM	\$355	\$36
6/7/2013	0.2	Reviewed class action case law from J Stein and other 2d court decisions	JLN	\$520	\$104
6/7/2013	0.2	Continued highlighting cases for motion for cert	JLN	\$520	\$104
6/7/2013	4.8	Legal research re: fraud cases & issue of reliance in 2d Cir	JLN	\$520	\$2,496
6/7/2013	4.4	Legal research re: use of generalized proof in class action cases	JLN	\$520	\$2,288
6/7/2013	2.6	Legal research re: fraud class actions under New York State law	JLN	\$520	\$1,352
6/7/2013	2.5	E-mail exchange w/ JGB motion for class cert	JLN	\$520	\$1,300
6/7/2013	0.2	Discussing plaintiff's book for deposition prep; sending question to plaintiff	PGM	\$245	\$49
6/7/2013	0.4	Edit of class certification brief	PGM	\$245	\$98
6/8/2013	2.6	Legal research re: issue of superiority under Sup.Ct. & 2d Cir. case law	JLN	\$520	\$1,352
6/8/2013	3.7	Legal research re: issue of reliance in fraud class actions under New York law	JLN	\$520	\$1,924
6/8/2013	4.9	Legal research re: fed cases that have cited McLaughlin & Moore decisions	JLN	\$520	\$2,548
6/9/2013	4.2	Legal research re: class actions brought under GBL 349 in federal court	JLN	\$520	\$2,184

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/9/2013	2.4	Legal research re: GBL 349 & lack of need to prove reliance	JLN	\$520	\$1,248
6/9/2013	1.7	Legal research re: distinction between affirmative misrepresentation v. omissions for purposes of certifying class action under GBL 349	JLN	\$520	\$884
6/10/2013	0.1	Discuss status with MYZ	JA	\$375	\$38
6/10/2013	2.8	Legal research re: SOL for unjust enrichment claim & possible use of longer SOL for NY members whose claims are otherwise time-barred	JLN	\$520	\$1,456
6/10/2013	1.9	Shepardized Jermyn, Dupler & Seekamp cases to find other class action cases re: GBL 349	JLN	\$520	\$988
6/10/2013	3.8	Legal research re: unjust enrichment for New York class	JLN	\$520	\$1,976
6/10/2013	1.9	Creating discovery binder	PGM	\$245	\$466
6/10/2013	0.4	Discussing next steps and discovery ltr. w/ apprentice	PGM	\$245	\$98
6/11/2013	0.1	Meet with MYZ regarding next steps: class cert brief.	KK	\$355	\$36
6/11/2013	3.9	Legal research re: variations in individual damages as a bar to certification	JLN	\$520	\$2,028
6/11/2013	4.1	Legal research re: IJL's liability for actions of individual franchises	JLN	\$520	\$2,132
6/11/2013	1.4	Created two bound volumes of all case law found from legal research re: class actions	JLN	\$520	\$728
6/12/2013	0.9	Emails to and from case team re deposition schedule; review deponent background	JGB	\$690	\$621
6/12/2013	0.1	Reply to inquiry by class member	PGM	\$245	\$25

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/12/2013	2	Calls from client re deposition schedule; relaying information to attorneys; saving documents into firm's electronic filing system; coordinating deposition dates w/ attorneys; comparing discovery demands for differences	PGM	\$245	\$490
6/12/2013	4.2	Started highlighting case law (Vol. 1) for use in motion	JLN	\$520	\$2,184
6/12/2013	3.9	Finished highlighting case law & best quotes for potential use in motion (Vol. 1)	JLN	\$520	\$2,028
6/12/2013	2.1	Started highlighting case law (Vol. 2) for use in motion	JLN	\$520	\$1,092
6/13/2013	0.1	Meet with MYZ regarding next steps: Response to OC regarding discovery.	KK	\$355	\$36
6/13/2013	0.6	Edits to ltr. to Klein re discovery; discussing discovery and demands w/ apprentice	PGM	\$245	\$147
6/13/2013	1	IJL - Wrote out response to Klein about discovery request (did case research to back up claims).	MYZ	\$265	\$265
6/13/2013	4.25	Finished highlighting case law & best quotes for potential use in motion (Vol. 2)	JLN	\$520	\$2,210
6/13/2013	6.1	Began process of extracting the best quotes from cases in Vol. 1 legal research & importing into draft certification brief	JLN	\$520	\$3,172
6/14/2013	2.3	Continued extracting quotes/case law from Vol. 2 for use in cert. motion	JLN	\$520	\$1,196
6/14/2013	5.4	Finished process of extracting the best quotes from Vol. 1 case law & importing into draft certification brief; started same process for Vol. 2 case law	JLN	\$520	\$2,808
6/14/2013	5.1	Continued process of extracting the best quotes from cases in Vol. 1 legal research & importing into draft certification brief	JLN	\$520	\$2,652

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/15/2013	3.9	Continued drafting preliminary statement/case overview	JLN	\$520	\$2,028
6/15/2013	4.75	Finished extracting quotes/case law from Vol. 2 case law for use in cert. motion	JLN	\$520	\$2,470
6/15/2013	3.1	Began drafting preliminary statement & overview of case	JLN	\$520	\$1,612
6/16/2013	0.4	Finished drafting preliminary statement/case overview	JLN	\$520	\$208
6/16/2013	4.5	Began drafting statement of facts for cert. brief	JLN	\$520	\$2,340
6/16/2013	5.6	Continued drafting statement of facts	JLN	\$520	\$2,912
6/17/2013	3.8	Began drafting statement re: applicable rules & standards	JLN	\$520	\$1,976
6/17/2013	0.4	Worked on certification brief; continued drafting section re: GBL349	JLN	\$520	\$208
6/17/2013	4.5	Continued drafting statement of facts	JLN	\$520	\$2,340
6/17/2013	1.5	Finished drafting statement of facts	JLN	\$520	\$780
6/18/2013	0.1	Meet with MYZ regarding next steps: class cert.	KK	\$355	\$36
6/18/2013	3.8	Started work on NY class claims under GBL 349.	JLN	\$520	\$1,976
6/18/2013	0.7	Reviewed Affidavit of Robert Vador; extracted quotes to use in support of IJL's admitted policy of overcharging NY residents	JLN	\$520	\$364
6/18/2013	1.1	Reviewed AG's AOD's; extracted quotes re: AG's findings to use to support claim that IJL's policy of overcharging NY residents is suitable for class treatment	JLN	\$520	\$572
6/18/2013	0.2	E-mail exchange JB re: strategy for dealing w/ defendant's untimely discovery demands	JLN	\$520	\$104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/18/2013	0.2	T/C Brad Berkowitz re: upcoming dep., possible prep dates and responsibilities of lead plaintiff e-mail	JLN	\$520	\$104
6/18/2013	4.25	Finished drafting statement re: applicable rules & standards	JLN	\$520	\$2,210
6/18/2013	0.1	Sending request to opposing counsel re class certification	PGM	\$245	\$25
6/19/2013	0.1	Meet with MYZ regarding next steps: motion for class cert.	KK	\$355	\$36
6/19/2013	3.2	Started drafting section relating to numerosity for NY class.	JLN	\$520	\$1,664
6/19/2013	1.6	Finished drafting section on numerosity	JLN	\$520	\$832
6/19/2013	4.7	Started drafting commonality section re: NY class	JLN	\$520	\$2,444
6/19/2013	0.75	E-mail correspondence w/ JB & PM re: getting page extension for cert brief	JLN	\$520	\$390
6/19/2013	2.25	Read J Stein's decision denying motion for reconsideration; did research on American Pipe tolling for state law claims	JLN	\$520	\$1,170
6/19/2013	0.2	Message to opposing counsel re class certification extension	PGM	\$245	\$49
6/20/2013	0.1	Meet with MYZ regarding next steps: class cert motion.	KK	\$355	\$36
6/20/2013	3.8	Finished drafting commonality re: NY class	JLN	\$520	\$1,976
6/20/2013	2.6	Started drafting typicality section re: NY class	JLN	\$520	\$1,352
6/20/2013	2.4	Finished drafting typicality section re: NY class	JLN	\$520	\$1,248
6/20/2013	2.2	Extensive revisions, edits, deletions & additions	JLN	\$520	\$1,144
6/20/2013	4.75	Continued drafting commonality section re: NY class	JLN	\$520	\$2,470

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/20/2013	0.6	Discussing class certification extension; contacting opposing counsel	PGM	\$245	\$147
6/21/2013	3.3	Discussing class certification stipulation and discovery responses w/PGM; review and edit class cert brief	JGB	\$690	\$2,277
6/21/2013	0.1	Discuss organizing arguments for motion to dismiss with MYZ	JA	\$375	\$38
6/21/2013	0.1	Continued working on draft of class cert motion	JLN	\$520	\$52
6/21/2013	2.8	Started drafting adequacy section re: Berkowitz as lead plaintiff & BF as lead counsel	JLN	\$520	\$1,456
6/21/2013	1.9	Finished drafting adequacy section re: lead plaintiff & lead counsel	JLN	\$520	\$988
6/21/2013	4.3	Started drafting section re: NY class's satisfaction of 23 (b)(3) requirements	JLN	\$520	\$2,236
6/21/2013	2	Continued working n class cert brief	JLN	\$520	\$1,040
6/21/2013	0.2	E-mail exchange with Phillip Menchaca regarding letter to Klein regarding late discovery request on Berkowitz	JLN	\$520	\$104
6/21/2013	0.9	Continued drafting adequacy section re: Berkowitz as lead plaintiff & BF as lead counsel	JLN	\$520	\$468
6/21/2013	1.1	Drafting stipulation and sending to opposing counsel; editing letter response to discovery demands	PGM	\$245	\$270
6/22/2013	1.9	Continued drafting section re: NY class's satisfaction of 23 (b)(3) requirements (394-c violation predominates)	JLN	\$520	\$988
6/22/2013	3.9	Continued drafting section re: NY class's satisfaction of 23 (b)(3) requirements (superiority)	JLN	\$520	\$2,028
6/22/2013	2.3	Finished drafting section re: NY class's satisfaction of 23 (b)(3) requirements (superiority)	JLN	\$520	\$1,196

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/23/2013	3.8	Edits to MCC; email to case team re: plan through filing	JGB	\$690	\$2,622
6/23/2013	4.3	Started drafting section re: unjust enrichment claim for all NY class members who were overcharged & whose GBL claims are time-barred	JLN	\$520	\$2,236
6/23/2013	2.3	Continued drafting section re: unjust enrichment claim for all NY class members whose GBL claims are otherwise time-barred	JLN	\$520	\$1,196
6/24/2013	0.1	Discussing class cert. w/ analyst	JGB	\$690	\$69
6/24/2013	0.1	Discuss with PGM as to stipulation discovery response.	JA	\$375	\$38
6/24/2013	3.6	Started drafting section of brief re: certification of national class & numerosity	JLN	\$520	\$1,872
6/24/2013	1.6	Continued drafting section relating to numerosity for national class	JLN	\$520	\$832
6/24/2013	3.8	Finished drafting section re: unjust enrichment claim for all NY class members whose claims are otherwise time-barred	JLN	\$520	\$1,976
6/24/2013	6.5	IJL - shepardized cases, worked on case cheat sheet for the class cert brief.	MYZ	\$265	\$1,723
6/24/2013	0.2	Call to court re class cert. extension request	PGM	\$245	\$49
6/25/2013	0.1	Meet with MYZ regarding next steps: class cert motion.	KK	\$355	\$36
6/25/2013	0.1	Line edit for PGM	JHK	\$245	\$25
6/25/2013	0.8	Review edits to MCC	JGB	\$690	\$552
6/25/2013	4.75	Started drafting commonality section re: national class	JLN	\$520	\$2,470
6/25/2013	5.8	Continued drafting commonality section re: national class	JLN	\$520	\$3,016

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/25/2013	0.1	Reviewed Stipulation regarding additional pages in plaintiffs' Memorandum of Law in support of class certification motion	JLN	\$520	\$52
6/25/2013	1.75	Finished drafting section on numerosity for national class	JLN	\$520	\$910
6/25/2013	0.7	Drafting, editing, and sending ltr to court re additional pages in class cert	PGM	\$245	\$172
6/25/2013	6.5	IJL - finished shepardizing cases, edited the content further for a final draft before sending to JGB for editing. Also reviewed the class cert brief sent back by JLN & corrected citation issues within the brief.	MYZ	\$265	\$1,723
6/26/2013	5.25	Finished drafting typicality section re: national class	JLN	\$520	\$2,730
6/26/2013	5.4	Finished drafting commonality re: national class	JLN	\$520	\$2,808
6/26/2013	1.6	Started drafting typicality section re: national class	JLN	\$520	\$832
6/26/2013	4.4	Continued drafting typicality section re: national class	JLN	\$520	\$2,288
6/26/2013	6.5	IJL - Line edit class cert brief, updated brief to include new lead plaintiffs, updated firm bio, exhibits.	MYZ	\$265	\$1,723
6/27/2013	0.1	Meet with MYZ regarding next steps: edits to class cert motion.	KK	\$355	\$36
6/27/2013	0.6	Reviewing discovery correspondence; editing discovery response letter to opposing counsel	JGB	\$690	\$414
6/27/2013	1	IJL - wrote letter to Klein, researched case law to support claims, re-wrote edits into final draft.	MYZ	\$265	\$265
6/27/2013	3.25	Drafting adequacy section re: named plaintiffs for national class	JLN	\$520	\$1,690

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/27/2013	5.25	Started drafting section re: national class's satisfaction of 23 (b)(3) requirements	JLN	\$520	\$2,730
6/27/2013	2.25	Continued drafting section re: national class's satisfaction of 23 (b)(3) requirements (predominates)	JLN	\$520	\$1,170
6/27/2013	4.25	Continued drafting section re: national class's satisfaction of 23 (b)(3) requirements (generalized proof).	JLN	\$520	\$2,210
6/27/2013	4	IJL - continued to work on class cert brief. Edits to previous day's unfinished work.	MYZ	\$265	\$1,060
6/27/2013	0.1	Editing ltr. re discovery demands	PGM	\$245	\$25
6/28/2013	0.8	Review and edit class certification brief	JGB	\$690	\$552
6/28/2013	3.4	Continued drafting section re: national class's satisfaction of 23 (b)(3) requirements (uniform script/ centralized training)	JLN	\$520	\$1,768
6/28/2013	2.9	Continued drafting section re: national class's satisfaction of 23 (b)(3) requirements (damages v. individualized claims)	JLN	\$520	\$1,508
6/28/2013	3.8	Continued drafting section re: national class's satisfaction of 23 (b)(3) requirements (unjust enrichment)	JLN	\$520	\$1,976
6/29/2013	2.6	Started drafting section re: national class's satisfaction of 23 (b)(3) superiority requirement.	JLN	\$520	\$1,352
6/29/2013	3.3	Continued drafting section re: superiority of national class	JLN	\$520	\$1,716
6/29/2013	3.8	Started drafting section re: national class's satisfaction of 23 (b)(3) superiority requirement	JLN	\$520	\$1,976
6/30/2013	1.2	Review and edit MCC: email to case team	JGB	\$690	\$828
6/30/2013	0.6	Drafted conclusion section re: relief sought	JLN	\$520	\$312

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/30/2013	2.6	Finished drafting section re: superiority requirement for national class	JLN	\$520	\$1,352
6/30/2013	4.6	Drafted section re: NY state court decisions holding that fraud actions may be suitable for class actions	JLN	\$520	\$2,392
7/1/2013	4.5	Edits to brief and papers related to class cert	JGB	\$690	\$3,105
7/1/2013	0.1	Discussion with PGM for class certification brief	JA	\$375	\$38
7/1/2013	0.1	Class certification brief Discussion with IJL	JA	\$375	\$38
7/1/2013	4.9	Continued revising & editing draft cert brief	JLN	\$520	\$2,548
7/1/2013	4.6	Continued revising & editing draft certification brief	JLN	\$520	\$2,392
7/1/2013	5.6	Continued working on revisions/edits of cert. brief	JLN	\$520	\$2,912
7/1/2013	0.7	Status check with apprentice; correspond with co-counsel on deposition date; correspond with opposing counsel regarding same; monthly update	PGM	\$245	\$172
7/1/2013	6.5	IJL - Line edit class cert brief; incorporated JLN's edits into current draft; rearranged argument section to better reflect JGB's narrative; attempted to edit down to 35 page limit in the SDNY.	MYZ	\$265	\$1,723
7/2/2013	3.2	Edit class cert; correspond with case team regarding same	JGB	\$690	\$2,208
7/2/2013	5.8	Robust Line Edit for Class Certification Motion	JHK	\$245	\$1,421
7/2/2013	0.3	Meet with MYZ and PGM regarding next steps: Class Cert. Follow up regarding firm bio and list of representative cases.	KK	\$355	\$107

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/2/2013	7.8	IJL - Revised draft based off JGB's multiple edits & revisions; worked on JHK's robust source edits; worked on SMP's robust source edits; worked on TOC, TOA, Exhibits, and revised the Declaration.	MYZ	\$265	\$2,067
7/2/2013	6.1	Further revisions/edits/deletions to draft cert brief	JLN	\$520	\$3,172
7/2/2013	5.8	Finalized changes/edits to draft cert brief.	JLN	\$520	\$3,016
7/2/2013	3.6	Robust Line Edit Memorandum of Law for Class Certification.	SMP	\$245	\$882
7/2/2013	7.4	Discuss edits to class certification with apprentice and attorney; search for and compile exhibits; update firm biography and declaration; draft and send letter to court; draft motion notice	PGM	\$245	\$1,813
7/3/2013	2.1	Consult with case team on status of motion for class certification; review papers	JGB	\$690	\$1,449
7/3/2013	0.4	Prepare exhibits to motion to certify class	PGM	\$245	\$98
7/3/2013	1.1	Create/ format Table of Contents; check page numbers of depositions for accuracy.	SMP	\$245	\$270
7/3/2013	0.2	Discuss class certification motion with MYZ and PGM.	JLM	\$355	\$71
7/3/2013	4.5	Edit Class Certification Brief	DLF	\$265	\$1,193
7/3/2013	0.1	Reviewed Court's Order. re: deposition of plaintiff Brad Berkowitz and briefing schedule for certification motion	JLN	\$520	\$52
7/3/2013	6	IJL - finished working on SMP's robust source edits; worked on table of contents, table of authorities, and the Declaration; Started verifying the exhibit quotes; did another intensive line edit.	MYZ	\$265	\$1,590
7/5/2013	0.1	Review correspondence regarding class certification edits	PGM	\$245	\$25

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/8/2013	1.9	Organize and put together exhibits.	SMP	\$245	\$466
7/8/2013	1.9	Review class certification edits; discuss exhibit preparation with apprentice and analyst; discuss class certification edits with attorney; review applicable law; correspond with opposing counsel regarding deposition date	PGM	\$245	\$466
7/8/2013	2.7	Discuss edits to motion for summary judgment with case team; correspond with opposing counsel regarding appeal; make edits to documents	JGB	\$690	\$1,863
7/8/2013	0.1	Discussion of class certification brief with MYZ	JA	\$375	\$38
7/8/2013	0.2	Discussion of class certification brief with PGM	JA	\$375	\$75
7/8/2013	6	IJL - Fix Class Cert exhibits to reflect the correct format in the Declaration; Meeting with JGB to discuss how to arrange Class Cert; Rearranged argument sections.	MYZ	\$265	\$1,590
7/9/2013	0.7	Edit and review declaration in response to motion to withdraw appeal; edit appeal papers	JGB	\$690	\$483
7/9/2013	6.1	IJL - Robust Line edited Class Cert brief; fixed JGB's preliminary edits to brief; Robust source edits.	MYZ	\$265	\$1,617
7/9/2013	0.6	Locate file on PA; Edit Memo of Law	DLF	\$265	\$159
7/9/2013	0.2	Meet with PGM and MYZ regarding next steps: class cert, Motion to withdraw appeal in 2d Circuit.	KK	\$355	\$71
7/9/2013	3.6	Research procedures governing second circuit reply; draft non-opposition declaration in response; email to co-counsel; email to opposing counsel; call to court; file non-opposition declaration response	PGM	\$245	\$882
7/9/2013	0.2	Robust line edit Declaration in Response to D's Withdrawal of Appeal.	SMP	\$245	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/10/2013	1.4	Correspond with case team regarding deposition preparation, motion for summary and its supporting documentation; editing motion for summary judgment and supporting documentation	JGB	\$690	\$966
7/10/2013	7	IJL - Updated Firm Biography; updated Declaration; updated JGB's edits to Class Cert brief; researched issue for JLN.	MYZ	\$265	\$1,855
7/10/2013	1.9	Discuss exhibits and plan for edits with apprentice and analysts; discuss case status with analyst covering day off; preparing documents for deposition; preparing exhibits to motion for summary judgment	PGM	\$245	\$466
7/11/2013	3.1	Discuss court binder with apprentice; prep court binder; save and code documents into firm's electronic management system; deliver deposition documents and pick up class certification edits from co-counsel; edit class certification	PGM	\$245	\$760
7/11/2013	1.1	Correspond and consult with case team regarding edits to motion for class cert; review and edit motion for class cert	JGB	\$690	\$759
7/11/2013	0.2	Line edit document.	SMP	\$245	\$49
7/11/2013	6.9	IJL - Incorporated JGB's edits; JLN's edits; updated Declaration; corresponded with JLN over issues with brief; helped with the robust line edits; deposition prep work.	MYZ	\$265	\$1,829
7/11/2013	0.2	Meet with PGM and MYZ regarding next steps: Class cert brief, edits from co-counsel, line editing, and deposition prep.	KK	\$355	\$71
7/11/2013	0.1	Reviewed Mandate of USCA (Certified Copy) as to 168 Notice of Appeal, filed by IJL	JLN	\$520	\$52
7/11/2013	2.9	Robust Line edit for PGM	JHK	\$245	\$711

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/12/2013	0.2	Email potential class member to collect contact information and update on case status	PGM	\$245	\$49
7/15/2013	2.9	Berkowitz dep questions (outline of potential issues)	JLN	\$520	\$1,508
7/15/2013	2.4	Complied all materials that could possibly be used in deposition of lead plaintiff B. Berkowitz, reviewed same to generate additional questions for mock dep	JLN	\$520	\$1,248
7/15/2013	0.1	Discuss with MYZ final edits and deposition work	JA	\$375	\$38
7/15/2013	3.5	IJL - Finish final JGB & JLN edits; input final robust line edits; Work on (core) Berkowitz Deposition Questions for JLN; Line edit.	MYZ	\$265	\$928
7/16/2013	0.4	Deposition preparation; phone call and follow-up emails to potential clients	PGM	\$245	\$98
7/16/2013	0.2	Meet with PGM regarding next steps: class cert brief.	KK	\$355	\$71
7/16/2013	5.25	Edits to class cert motion	JLN	\$520	\$2,730
7/16/2013	3.4	Continued drafting mock deposition outline for questions to BB at upcoming deposition	JLN	\$520	\$1,768
7/17/2013	0.1	Meet with PGM and MYZ regarding next steps: class cert edits.	KK	\$355	\$36
7/17/2013	0.2	Update client list	PGM	\$245	\$49
7/18/2013	0.1	Touch base with case team re filing	JGB	\$690	\$69
7/18/2013	0.1	Meet with PGM regarding next steps: filing class cert brief.	KK	\$355	\$36
7/18/2013	0.7	Reviewed Memorandum of Law in Support Motion to Certify Class (as filed)	JLN	\$520	\$364
7/18/2013	0.8	Reviewed Declaration of John Balestriere in Support of class action	JLN	\$520	\$416

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/18/2013	3.8	Finished drafting mock deposition outline for BB.	JLN	\$520	\$1,976
7/18/2013	3.8	Edit class certification; discuss exhibits with apprentice and finalize same; file class certification; discuss filing with attorney; respond to potential class member	PGM	\$245	\$931
7/19/2013	0.1	Email to case team re: deposition and case status.	JGB	\$690	\$69
7/22/2013	0.1	Discuss response to potential class member with analyst	JGB	\$690	\$69
7/22/2013	0.1	Line edit a letter for PGM	JHK	\$245	\$25
7/22/2013	3.3	Met w/Brad Berkowitz to prep him for deposition.	JLN	\$520	\$1,716
7/22/2013	1.7	Email co-counsel regarding deposition preparation; prepare and file courtesy copies of class certification; respond to potential class members	PGM	\$245	\$417
7/23/2013	0.1	Review potential class member's contract and send to co-counsel for review	PGM	\$245	\$25
7/26/2013	1.7	Attend deposition	PGM	\$245	\$417
7/26/2013	6.1	Deposition of Brad Berkowitz	JLN	\$520	\$3,172
7/29/2013	0.5	Respond to potential class member; save article into firm's document management system	PGM	\$245	\$123
7/29/2013	0.1	Discuss with PGM upcoming deposition	JA	\$375	\$38
7/29/2013	0.5	IJL - Replied to emails; read report sent by JGB	MYZ	\$265	\$133
7/30/2013	0.3	Save Miami Herald article into firm's electronic management system; correspond with attorneys regarding class member communications and obligations	PGM	\$245	\$74
8/1/2013	0.1	Update class member list	PGM	\$245	\$25
8/2/2013	0.1	Correspond with case team regarding Illinois action.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/6/2013	0.1	Meet with PGM regarding next steps: contacting class members.	KK	\$355	\$36
8/6/2013	0.2	Respond to potential class members; update class member database	PGM	\$245	\$49
8/7/2013	0.3	Respond to potential class members; update class member database	PGM	\$245	\$74
8/11/2013	0.2	E-mail from and to Balestriere's office re Laura Davies	JLN	\$520	\$104
8/12/2013	0.2	Correspond with class members	PGM	\$245	\$49
8/13/2013	0.4	Correspond with analyst regarding class member inquiry; edits to letter	JGB	\$690	\$276
8/13/2013	1.8	Draft letter regarding 26(a) supplements; contact potential class members	PGM	\$245	\$441
8/13/2013	0.1	Meet with PGM regarding next steps: letter regarding 26a supplemental disclosures.	KK	\$355	\$36
8/15/2013	0.1	Plan schedule for class certification reply with co-counsel	JGB	\$690	\$69
8/15/2013	0.1	E-mail from and to Balestriere's office re Nancy Wolkow	JLN	\$520	\$52
8/15/2013	0.1	Respond to potential class member	PGM	\$245	\$25
8/19/2013	0.1	Update 26(a) disclosure letter	PGM	\$245	\$25
8/21/2013	3.1	Sort, save, and code documents into firm's practice management and documents database; respond to potential class members; review defendant's extension for time and prepare response to same; fax to court; update court binder	PGM	\$245	\$760
8/21/2013	0.9	Draft and edit letter to court in reply to Defendant's opposition extension request	JGB	\$690	\$621

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/21/2013	0.1	Line edit letter to Court	JHK	\$245	\$25
8/22/2013	0.7	Reply to potential class members; save, sort, and code documents into firm's document management system; contact opposing counsel regarding transcript	PGM	\$245	\$172
8/22/2013	0.2	Reviewing correspondence with potential class member and opposing counsel	JGB	\$690	\$138
8/22/2013	0.1	Meet with PGM regarding next steps: following up with clients/class members.	KK	\$355	\$36
8/22/2013	0.2	Reviewed letter addressed to Judge Stein from Klein re: IJL request for permission to enlarge to 50 pages the length of Opp. Brief	JLN	\$520	\$104
8/23/2013	0.3	Finalize and send 26(a) letter to opposing counsel	PGM	\$245	\$74
8/23/2013	2.6	Researched case law cited by defendants in opp. brief re: commonality under Rule 23(a)	JLN	\$520	\$1,352
8/23/2013	3.7	Researched cases cited by defendants in opp. br. re: predominance under Rule 23(b)(3)	JLN	\$520	\$1,924
8/23/2013	0.3	Researched case law cited by defendants re: superiority requirement	JLN	\$520	\$156
8/23/2013	1.2	Reviewed Memorandum of Law in Opposition to cert. brief; took notes re: same	JLN	\$520	\$624
8/23/2013	0.6	Reviewed Declaration of Peter T. Shapiro in Opposition	JLN	\$520	\$312
8/23/2013	0.1	Discuss with PGM updated 26A letter	JGB	\$690	\$69
8/24/2013	3.6	Researched case law cited by defs. re: variations in states' laws as precluding cert. of class	JLN	\$520	\$1,872
8/24/2013	2.9	Researched choice of law issue raised by defendants in fn. 6 of their brief	JLN	\$520	\$1,508

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/24/2013	2.7	Researched case law cited by defs re: ascertainability of class; researched general standards for ascertainability of identifiable class	JLN	\$520	\$1,404
8/25/2013	2.4	Continued research issue of uniformity v. variations in fraud claims across U.S.	JLN	\$520	\$1,248
8/25/2013	3.75	Researched case law cited by defendants re: alleged variations in unjust enrichment claims across the country	JLN	\$520	\$1,950
8/25/2013	4.25	Researched issue of whether there is uniformity in main elements of fraud claims across the country	JLN	\$520	\$2,210
8/25/2013	0.2	E-mail from and to Balestriere's office re Berlowitz's deposition	JLN	\$520	\$104
8/26/2013	3.8	Researched issue of whether there is uniformity in core elements of unjust enrichment claims across the country	JLN	\$520	\$1,976
8/26/2013	2.9	Researched case law re: typicality requirements as cited by defendants	JLN	\$520	\$1,508
8/27/2013	0.6	Sort, save, and code documents into firm's practice management and documents database.	PGM	\$245	\$147
8/27/2013	3.4	Researched case law cited by defendants re: generalized proof/reliance	JLN	\$520	\$1,768
8/27/2013	4.25	Reviewed all evidentiary citations to the record made by defendants in their opp, including Affs. of Vandor, Osgood, Anderson & Brown, Vandor Dep, Brown Dep, Velasquez Dep., LePage Dep., Craig Dep	JLN	\$520	\$2,210
8/28/2013	0.4	Correspond with potential class members	PGM	\$245	\$98
8/28/2013	3.2	Researched Rule 23(c)(4) & potential certification on narrowly tailored liability issues, as fallback should court deny national class	JLN	\$520	\$1,664
8/28/2013	1.25	Continued research of Rule 23(c)(4)	JLN	\$520	\$650

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/29/2013	0.1	Review emails to clients	JGB	\$690	\$69
8/29/2013	0.6	Respond to potential class members	PGM	\$245	\$147
9/3/2013	2.1	Researched management tools available to District Ct. if class proves too unwieldy	JLN	\$520	\$1,092
9/3/2013	0.75	Compiled all research & combined into volume for use in Reply brief	JLN	\$520	\$390
9/3/2013	4.25	Highlighted all case law for use in Reply brief; began process of extracting best quotes & importing into draft reply	JLN	\$520	\$2,210
9/4/2013	0.2	Correspond with analyst and opposing counsel regarding obtaining transcript of deposition	JGB	\$690	\$138
9/4/2013	3.4	Finished importing best quotes from new research into draft reply brief	JLN	\$520	\$1,768
9/4/2013	4.8	Started drafting reply brief for class cert motion; began working on section re: NY class & numerosity	JLN	\$520	\$2,496
9/4/2013	0.6	Email opposing counsel regarding transcript; correspond with case team regarding change in representation; save, sort, and code documents into firm's document management system	PGM	\$245	\$147
9/5/2013	1.1	Correspond with potential class members	PGM	\$245	\$270
9/5/2013	0.1	Meet with PGM regarding next steps: following up with class members.	KK	\$355	\$36
9/5/2013	2.6	Drafted section re: Berkowitz's claim is typical of other class members	JLN	\$520	\$1,352
9/5/2013	3.8	Finished section re: no reliance means common issues predominate	JLN	\$520	\$1,976
9/5/2013	4.2	Started drafting section re: common liability issues predominate b/c no reliance element.	JLN	\$520	\$2,184

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/6/2013	1.2	Sort, save, and code documents into firm's practice management and documents database; correspond with opposing counsel regarding transcript; correspond with potential class members	PGM	\$245	\$294
9/6/2013	4.8	Began drafting section re: individual claims do not preclude certification	JLN	\$520	\$2,496
9/6/2013	3.2	Finished section re: individual damage claims v. commonality	JLN	\$520	\$1,664
9/7/2013	0.1	Touch base with case team re next week's plan	JGB	\$690	\$69
9/9/2013	0.9	Respond to potential class members; save, sort, and code documents into firm's document management system	PGM	\$265	\$239
9/10/2013	0.1	Meet with PGM regarding next steps.	KK	\$385	\$39
9/10/2013	0.1	Review emails with class members	JGB	\$690	\$69
9/10/2013	0.75	Drafted IJL Class Certification Reply	JLN	\$520	\$390
9/11/2013	0.2	Correspond with class members	PGM	\$265	\$53
9/12/2013	0.1	Meet with PGM regarding next steps: engagement issues.	KK	\$385	\$39
9/12/2013	0.9	Draft and send engagement letters	PGM	\$265	\$239
9/14/2013	3.4	Drafted section re: Berkowitz is an adequate class rep. for NY class	JLN	\$520	\$1,768
9/14/2013	1.2	Drafted section re: class action is superior (v. Atty Gen. enforcement)	JLN	\$520	\$624
9/14/2013	2.8	Drafted section re: defendants' relitigation of summary judgment motion	JLN	\$520	\$1,456
9/15/2013	4.6	Drafted section re: variations in state law do not preclude certification	JLN	\$520	\$2,392

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/15/2013	3.4	Drafted section re: individual defenses do not preclude certification	JLN	\$520	\$1,768
9/16/2013	3.7	Drafted section re: ascertainability of class	JLN	\$520	\$1,924
9/16/2013	1.2	Reviewed Berkowitz deposition transcript; took notes re: same	JLN	\$520	\$624
9/16/2013	4.25	Drafted section re: generalized proof for reliance once material misrep. is shown	JLN	\$520	\$2,210
9/17/2013	3.2	Began drafting section re: management tools available to court to deal w/individualized issues that might arise	JLN	\$520	\$1,664
9/17/2013	4.1	Began drafting section re: certification of limited issues under R. 23 (c)(4)	JLN	\$520	\$2,132
9/17/2013	0.9	Draft and send engagement letter; review record of potential class members for 26(a) supplement	PGM	\$265	\$239
9/18/2013	3.6	Finished section re: certification of specific issues under R. 23 (c)(4)	JLN	\$520	\$1,872
9/19/2013	0.1	Meet with PGM regarding next steps: setting up Dropbox.	KK	\$385	\$39
9/19/2013	2.8	Drafted section re: conflicts of laws & application of NY law	JLN	\$520	\$1,456
9/19/2013	0.2	Create Dropbox and upload documents in preparation for editing and reviewing class certification reply	PGM	\$265	\$53
9/20/2013	4.25	Made extensive edits & revisions to all sections of reply brief	JLN	\$520	\$2,210
9/20/2013	3.5	Continued making extensive edits/revisions to reply brief	JLN	\$520	\$1,820
9/20/2013	0.1	Contact potential class member	PGM	\$265	\$27
9/21/2013	4.8	Continued making edits/revisions to all sections of brief	JLN	\$520	\$2,496

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/22/2013	3.6	Continued edits/revisions of reply brief	JLN	\$520	\$1,872
9/23/2013	0.3	Edit request for extension on reply in motion for class certification	JGB	\$690	\$207
9/23/2013	0.1	Talk to PGM about status of case and work on stipulation and motion to certify class.	JA	\$405	\$41
9/23/2013	2.3	Draft and edit letter to court regarding extension of time; contact opposing counsel and discuss same with attorney	PGM	\$265	\$610
9/24/2013	0.2	Correspond with potential class members	PGM	\$265	\$53
9/24/2013	0.1	Reviewed letter for extension of reply deadline and extension of 5 pages beyond the 10 pages allowed	JLN	\$520	\$52
9/25/2013	0.2	Correspond with case team regarding motion for class certification reply	JGB	\$690	\$138
9/25/2013	0.1	Meet with PGM regarding next steps: following up with potential fact witnesses.	KK	\$385	\$39
9/25/2013	5.5	Finished edits/revisions of reply brief; sent to JGB for review	JLN	\$520	\$2,860
9/25/2013	1.2	Check status of extension request; sort, save, and code documents into firm's electronic management system; respond to potential class members; review class cert reply	PGM	\$265	\$318
9/26/2013	0.7	Correspond with potential class members; review discovery file	PGM	\$265	\$186
9/27/2013	0.4	Review opposition papers in prep for reply; review reply draft	JGB	\$690	\$276
9/30/2013	2.3	Monthly review of documents, filings, contacts, and other summary and general case information; respond to potential class member; review and update Judge's rules	PGM	\$265	\$610

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/30/2013	0.2	Correspond with case team regarding motion for class certification reply; edit reply	JGB	\$690	\$138
9/30/2013	0.1	Discuss with PGM motion to certify class.	JA	\$405	\$41
10/1/2013	0.1	Respond to potential class member.	PGM	\$265	\$27
10/1/2013	0.1	Meet with PGM regarding next steps: reply for class cert motion.	KK	\$385	\$39
10/2/2013	2.1	Edit reply papers for motion to certify class two times; discuss same with analyst	JGB	\$690	\$1,449
10/2/2013	5.1	Call to court confirming courtesy copy rules; edit reply brief.	PGM	\$265	\$1,352
10/3/2013	2.1	Edit reply brief and discuss same with analyst	JGB	\$690	\$1,449
10/3/2013	0.1	Meet with PGM regarding next steps: reply to class cert.	KK	\$385	\$39
10/3/2013	0.6	Line edit memorandum of law	SMP	\$265	\$159
10/3/2013	7.3	Edit class certification brief and prepare accompanying papers.	PGM	\$265	\$1,935
10/3/2013	2.4	Help PGM with reply brief formatting; robust line edit reply brief	JHK	\$265	\$636
10/4/2013	5.7	Finalize reply brief; update potential class list; correspond with potential class member.	PGM	\$265	\$1,511
10/4/2013	0.4	Finalize reply brief and discuss filing with analyst	JGB	\$690	\$276
10/4/2013	0.7	Line edit memorandum of law	SMP	\$265	\$186
10/4/2013	0.9	Reviewed First Reply Memorandum of Law in Support First Motion to certify Class for Appointment of Representative and Class Counsel (as filed)	JLN	\$520	\$468

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/4/2013	0.6	Reviewed Declaration of JB in Support First Motion to Certify Class for Appointment of Representative and Class Counsel (as filed)	JLN	\$520	\$312
10/7/2013	0.2	Correspond with case team regarding defendants' application for sur-reply and new action against defendants	JGB	\$690	\$138
10/7/2013	0.6	Correspond with JLN and potential class member; review letter from defendants and investigate new action; save, sort, and code documents into firm's document management system.	PGM	\$265	\$159
10/8/2013	2.7	Correspond with case team and outside counsel regarding new action and plan response; review IL statutes	JGB	\$690	\$1,863
10/8/2013	0.1	Meet with PGM regarding next steps: dealing with Illinois suit.	KK	\$385	\$39
10/8/2013	3.2	Research new action and discuss with JGB; draft letter to court; contact chancery court.	PGM	\$265	\$848
10/10/2013	0.3	Contact opposing counsel regarding new action; emails to and from case team	JGB	\$690	\$207
10/10/2013	0.2	Correspond with potential class member.	PGM	\$265	\$53
10/11/2013	1.7	Draft letter to court regarding new action; review correspondence between counsel regarding same; correspond with counsel regarding It's Just Lunch employee; complete weekly review and organization of files and case developments	PGM	\$265	\$451
10/14/2013	0.6	Edit letter to court regarding new action.	PGM	\$265	\$159
10/15/2013	0.2	Correspond with case team regarding filing of letter regarding new action	JGB	\$690	\$138
10/15/2013	0.9	T/C with Trish Burton (former IJL employee - Franklin, Tennessee) - IJL re: deceptive IJL sales tactics	JLN	\$520	\$468

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/15/2013	0.1	Reviewed letter to Judge Stein from JB re: Oral Argument on motion to certify class	JLN	\$520	\$52
10/15/2013	0.2	Line edit letter to Court	JHK	\$265	\$53
10/15/2013	0.6	Finalize and file letter regarding new action.	PGM	\$265	\$159
10/16/2013	0.1	Reviewed letter to Judge Stein from Peter T. Shapiro dated October 16, 2013 re: plaintiff's letter regarding class certification hearing.	JLN	\$520	\$52
10/16/2013	0.1	Sort, save, and code letter regarding new action into firm's practice management and documents database; contact Illinois chambers.	PGM	\$265	\$27
10/17/2013	0.1	Correspond with case team regarding Illinois action.	JGB	\$690	\$69
10/17/2013	0.1	Meet with PGM regarding next steps: contacting clients and fact witnesses.	KK	\$385	\$39
10/17/2013	0.3	Call to Illinois chambers; status update to case team.	PGM	\$265	\$80
10/18/2013	0.4	Respond to potential class member; complete weekly review, organization, and update of case documents.	PGM	\$265	\$106
10/18/2013	0.8	Reviewed Documents from Trish Burton re: Call Script	JLN	\$520	\$416
10/22/2013	0.3	Correspond with potential class member.	PGM	\$265	\$80
10/24/2013	0.3	Correspond with potential class member.	PGM	\$265	\$80
10/25/2013	0.1	Discuss with PGM contacting potential class members.	JA	\$405	\$41
10/25/2013	1.2	Correspond with potential class member; check Illinois docket sheet; update attorneys on case status; complete weekly review, update, and organization of case documents.	PGM	\$265	\$318

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/29/2013	0.1	Meet with PGM regarding next steps: updates to class members.	KK	\$385	\$39
10/29/2013	0.8	Update class list; correspond with potential class members.	PGM	\$265	\$212
10/30/2013	0.2	Correspond with case team regarding 26(a) disclosure and potential class member inquiry	JGB	\$690	\$138
10/30/2013	1.7	Correspond with potential class members and case team regarding class member inquiry; update class member database.	PGM	\$265	\$451
10/31/2013	0.1	Meet with PGM regarding next steps: 26A letter.	KK	\$385	\$39
10/31/2013	2.8	Monthly review of documents, filings, contacts, and other summary and general case information; sort, save, and code documents into firm's document management system; draft 26(a) supplemental disclosures; call Illinois court and correspond with case team regarding Illinois action.	PGM	\$265	\$742
10/31/2013	0.1	Correspond with case team regarding Illinois action against IJL	JGB	\$690	\$69
11/1/2013	0.3	Correspond with potential class member; complete weekly review and update of case files.	PGM	\$265	\$80
11/1/2013	0.1	Review status update to class members.	JGB	\$690	\$69
11/4/2013	1.3	Update class member database; correspond with potential class member; draft engagement letter.	PGM	\$265	\$345
11/5/2013	0.1	Finalize and send engagement letter to potential class member.	PGM	\$265	\$27
11/5/2013	0.1	Meet with PGM regarding next steps: engagement letter.	KK	\$385	\$39
11/5/2013	0.3	E-mail exchange with Nicole Ayala (Conn. AG's office) re: investigations AG's into IJL in Connecticut re: contract provisions	JLN	\$520	\$156

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/6/2013	0.1	Review message from potential client and discuss with case team.	JGB	\$690	\$69
11/6/2013	0.2	F/u e-mail exchange with Nicole Ayala	JLN	\$520	\$104
11/6/2013	0.3	Correspond with potential class member.	PGM	\$265	\$80
11/7/2013	0.1	Correspond with case team regarding attorney general investigation.	JGB	\$690	\$69
11/7/2013	0.75	T/c w/Nicole Ayala re: Connecticut's investigation into IJL & findings made by AG's office & settlement reached with IJL	JLN	\$520	\$390
11/7/2013	0.3	Correspond with potential class members; correspond with case team regarding attorney general investigation.	PGM	\$265	\$80
11/8/2013	1.4	Correspond with potential class member; amend 26(a) letter; save, sort, and code documents into firm's document management system; complete weekly review, organization, and update of case files.	PGM	\$265	\$371
11/12/2013	0.1	Correspond with analyst regarding potential class member question about engagement.	JGB	\$690	\$69
11/12/2013	0.1	Meet with PGM regarding next steps: class correspondence.	KK	\$385	\$39
11/12/2013	1.7	Update case team on status; correspond with case team regarding potential class member questions; correspond with potential class members.	PGM	\$265	\$451
11/13/2013	0.2	Correspond with case team regarding Illinois action hearing outcome.	JGB	\$690	\$138
11/13/2013	1.1	Check status of Illinois action; correspond with potential class members; discuss status with case team.	PGM	\$265	\$292

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/14/2013	0.1	Correspond with case team regarding Illinois action.	JGB	\$690	\$69
11/14/2013	0.1	E-mail from and to Balestriere's office correspondence received from William Sweetnam, Esq	JLN	\$520	\$52
11/14/2013	0.6	Correspond with class member; check status of Illinois action.	PGM	\$265	\$159
11/15/2013	0.7	Check status of Illinois action and correspond with JGB and JLN regarding same; complete weekly review, organization, and update of case files.	PGM	\$265	\$186
11/18/2013	0.1	Correspond with analyst regarding status of Illinois action.	JGB	\$690	\$69
11/18/2013	0.25	T/C with Nicole Ayala, Attorney in CT AG's office re: IJL investigation	JLN	\$520	\$130
11/18/2013	0.1	Discuss with PGM status on separate class action on Illinois action.	JA	\$405	\$41
11/18/2013	1.3	Check status of Illinois action; correspond with potential class members.	PGM	\$265	\$345
11/19/2013	0.4	Check status of Illinois action.	PGM	\$265	\$106
11/19/2013	0.1	Meet with PGM regarding next steps: checking status of Illinois action.	KK	\$385	\$39
11/20/2013	0.4	Correspond with potential class member; correspond with MJN and JGB regarding request for copy of complaint.	PGM	\$265	\$106
11/20/2013	0.2	Correspond with MJN and analyst regarding potential class member email and request for copy of complaint.	JGB	\$690	\$138
11/22/2013	0.3	Correspond with potential class member; complete weekly update and review of court files.	PGM	\$265	\$80

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/25/2013	0.1	Review voicemail from potential class member.	JGB	\$690	\$69
11/26/2013	0.2	Correspond with outside counsel making inquiry regarding case.	JGB	\$690	\$138
11/26/2013	0.1	Sort, save, and code documents into firm's practice management and documents database.	PGM	\$265	\$27
11/27/2013	0.3	Correspond with potential class member; complete monthly review and organization of court filings and case documents,	PGM	\$265	\$80
12/2/2013	0.2	Check status of Illinois action.	PGM	\$265	\$53
12/2/2013	0.4	Research status of related case in IL; determine status of MTD.	PGP	\$265	\$106
12/2/2013	0.1	Discuss status on separate Illinois action.	JA	\$405	\$41
12/4/2013	0.1	Correspond with potential class member.	PGM	\$265	\$27
12/5/2013	0.2	Correspond with case team regarding status of MTD	PGP	\$265	\$53
12/5/2013	0.1	Correspond with analyst regarding status of Illinois action.	JGB	\$690	\$69
12/5/2013	0.1	Meet with PGM regarding next steps: updating class member mailing list.	KK	\$385	\$39
12/5/2013	0.1	E-mail exchange with JB's office re Trish Burton's Address	JLN	\$520	\$52
12/5/2013	0.1	E-Mail exchange with JB's office re Comment from Website	JLN	\$520	\$52
12/5/2013	2.1	Compile new class member database; draft 26(a) letter; correspond with potential class member.	PGM	\$265	\$557
12/6/2013	1.9	Edit 26(a) disclosure; discuss 26(a) with JGB; correspond with class member; complete weekly organization and review of case files.	PGM	\$265	\$504

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/6/2013	0.1	Discuss 26(a) supplemental disclosure with analyst.	JGB	\$690	\$69
12/6/2013	0.2	E-mail exchange with JB's office re 26(a) supplementing disclosure	JLN	\$520	\$104
12/9/2013	0.9	Update class member database.	PGM	\$265	\$239
12/10/2013	0.3	Correspond with analyst regarding class member reimbursement and termination of class member status.	JGB	\$690	\$207
12/10/2013	0.4	Correspond with class member regarding reimbursement; correspond with JGB regarding same.	PGM	\$265	\$106
12/11/2013	0.1	Meet with PGM regarding next steps: corresponding with class members.	KK	\$385	\$39
12/11/2013	0.2	Correspond with class member regarding engagement.	PGM	\$265	\$53
12/12/2013	0.1	Correspond with analyst regarding class member inquiry.	JGB	\$690	\$69
12/12/2013	0.1	Meet with PGM regarding next steps: responding to emails from class members.	KK	\$385	\$39
12/12/2013	0.4	Correspond with class member regarding case status.	PGM	\$265	\$106
12/13/2013	0.1	Complete weekly review, update, and organization of case files.	PGM	\$265	\$27
12/17/2013	0.1	Email from co-counsel re: next steps.	JGB	\$690	\$69
12/18/2013	0.4	Correspond with potential class member.	PGM	\$265	\$106
12/23/2013	0.1	Review case status update to class members.	JGB	\$690	\$69
12/23/2013	0.1	Draft update to class members on status of case.	PGM	\$265	\$27
12/23/2013	0.1	Discuss contacting potential class members with PGM.	JA	\$405	\$41

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/27/2013	0.2	Correspond with potential class member.	PGM	\$265	\$53
12/30/2013	0.1	Correspond with potential class member.	PGM	\$265	\$27
12/30/2013	0.1	E-mail exchange with JB's office new David Peebles (employee to IJL)	JLN	\$520	\$52
1/2/2014	0.5	Update class member list; correspond with class member.	PGM	\$265	\$133
1/3/2014	0.8	Sort, save, and code documents into firm's practice management and documents database; correspond with case team regarding class member contract; review class member contract; complete weekly update and organization of case documents.	PGM	\$265	\$212
1/3/2014	0.3	Correspond with analyst and co-counsel regarding clauses in class member's contract.	JGB	\$690	\$207
1/9/2014	0.1	Sort, save, and code documents into firm's practice management and documents database.	PGM	\$265	\$27
1/10/2014	0.2	Correspond with co-counsel regarding potential meeting; correspond with co-counsel and analyst regarding response to potential class member.	JGB	\$690	\$138
1/10/2014	0.7	Complete weekly review and organization of case files; correspond with potential class members.	PGM	\$265	\$186
1/13/2014	0.9	Correspond with potential class members; update class database.	PGM	\$265	\$239
1/14/2014	0.3	Correspond with class members; update class member database.	PGM	\$265	\$80
1/15/2014	0.1	Correspond with co-counsel regarding meeting; correspond with analyst regarding Illinois action.	JGB	\$690	\$69
1/15/2014	0.3	Correspond with class members; check Illinois docket.	PGM	\$265	\$80

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/17/2014	0.2	Complete weekly review, organization, and update of case files; correspond with potential class member.	PGM	\$265	\$53
1/21/2014	0.1	Correspond with co-counsel regarding meeting to discuss case status.	JGB	\$690	\$69
1/21/2014	0.4	Correspond with potential class members; update class member database.	PGM	\$265	\$106
1/22/2014	0.2	Correspond with co-counsel regarding meeting to discuss case status.	JGB	\$690	\$138
1/22/2014	0.1	Correspond with potential class member.	PGM	\$265	\$27
1/23/2014	0.2	Correspond with potential class member.	PGM	\$265	\$53
1/24/2014	0.3	Discuss case status and next steps with co-counsel.	JGB	\$690	\$207
1/24/2014	0.1	Complete weekly review, organization, and update of case files;	PGM	\$265	\$27
1/24/2014	0.1	T/c with IJL NYC client Jenny Lager re: joining class action	JLN	\$520	\$52
1/27/2014	0.3	Correspond with case team regarding next steps and 26(a) supplemental disclosures.	JGB	\$690	\$207
1/27/2014	1.8	Correspond with co-counsel regarding hours; edit 26(a) disclosures; follow up with Illinois court regarding case status; shepardize cases.	PGM	\$265	\$477
1/28/2014	0.6	Correspond with analyst and co-counsel regarding 26(a) disclosures and contacting court.	JGB	\$690	\$414
1/28/2014	0.1	Meet with PGM regarding next steps: finalizing 26A disclosures and reviewing cases cited in opp to class cert.	KK	\$385	\$39
1/28/2014	0.5	Review of new e-mail from IJL client Melanie Peck re: list of issues/corp/ with IJL	JLN	\$520	\$260

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/28/2014	0.1	Meeting with JB re: case strategies and motion for certification and supplemental Rule 26 disclosure	JLN	\$520	\$52
1/28/2014	0.1	E-mail exchange re: supplemental Rule 26 disclosure	JLN	\$520	\$52
1/28/2014	1.7	Correspond with class member regarding documents; correspond with case team regarding 26(a) disclosures; correspond with JGB regarding case law research.	PGM	\$265	\$451
1/29/2014	0.4	Correspond with analyst regarding letter to court; review applicable authority	JGB	\$690	\$276
1/29/2014	0.1	T/c with JB re: work done to date and reaching out to counsel in Illinois	JLN	\$520	\$52
1/29/2014	5.8	Finalize 26(a) supplement; research case law regarding new, relevant authority; research lode star calculations; draft letter to court.	PGM	\$265	\$1,537
1/30/2014	0.1	Discuss with PGM re: letter on new authority and fee calculation.	SS	\$340	\$34
1/30/2014	0.1	Review of supplemental disclosures for exchange under Rule 26 re: additional witnesses and training materials. e-mail exchange re: same	JLN	\$520	\$52
1/30/2014	0.3	Correspond with potential class member; research fee awards.	PGM	\$265	\$80
1/31/2014	0.4	Correspond with case team regarding 26(a) supplement and authority letters.	JGB	\$690	\$276
1/31/2014	0.3	Monthly review of documents, filings, contacts, and other summary and general case information; finalize letters regarding 26(a) and authority; correspond with case team regarding same.	PGM	\$265	\$80
1/31/2014	0.1	E-mail from and to Balestriere's office re 26(a) Disclosure Supplement	JLN	\$520	\$52
1/31/2014	0.1	Discuss with PGM re: edits from JGB on letter to court.	SS	\$340	\$34

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/3/2014	0.6	Discuss 26(a) disclosures and authority letter with analyst; review and edit letters to court.	JGB	\$690	\$414
2/3/2014	0.1	Meet with PGM regarding next steps: serving 26A disclosures; letter to court.	KK	\$385	\$39
2/3/2014	0.2	Review emails re: reply letter to court. Discuss same with PGM and edit letter.	SS	\$340	\$68
2/3/2014	0.1	Reviewed letter to Judge Stein from JB re: class certification	JLN	\$520	\$52
2/3/2014	0.1	Reviewed letter to Judge Stein from Peter T. Shapiro dated February 3, 2014 re: plaintiff's letter.	JLN	\$520	\$52
2/3/2014	0.1	Edit letter to the Court.	JLM	\$385	\$39
2/3/2014	2.9	Finalize and send 26(a) supplement and file letter regarding authority; draft letter reply to defendant's letter.	PGM	\$265	\$769
2/4/2014	0.1	Review monthly update to class members.	JGB	\$690	\$69
2/6/2014	0.1	Meet with PGM to discuss next steps: fees letter.	KK	\$385	\$39
2/7/2014	0.1	Correspond with case team regarding Illinois action.	JGB	\$690	\$69
2/7/2014	1.1	Complete weekly review, organization, and update of case files; draft letter regarding fees; contact court regarding Illinois action and correspond with case team regarding same.	PGM	\$265	\$292
2/10/2014	0.1	Correspond with potential class member.	PGM	\$265	\$27
2/10/2014	0.2	E-mail exchange with JB's office re TV Commercial, Client Question and Travel Expenses	JLN	\$520	\$104
2/10/2014	0.2	Emails to and from co-counsel re: next steps	JGB	\$690	\$138
2/11/2014	1.8	Discuss case status with PGM; work on lodestar calculations	PGP	\$265	\$477

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/11/2014	0.1	Discuss with PGM re: drafting fees letter.	SS	\$340	\$34
2/11/2014	1.8	Correspond with potential class members; discuss fee calculation with analyst; draft fees letter and calculate lodestar.	PGM	\$265	\$477
2/12/2014	0.1	Correspond with analyst regarding potential class member question.	JGB	\$690	\$69
2/12/2014	0.1	Correspond with potential class member.	PGM	\$265	\$27
2/13/2014	0.1	Correspond with case team regarding status of Illinois action.	JGB	\$690	\$69
2/13/2014	0.1	E-mail exchange with JB's office re Illinois Action Update	JLN	\$520	\$52
2/13/2014	0.1	Contact court regarding Illinois action.	PGM	\$265	\$27
2/14/2014	0.1	Complete weekly review, organization, and update of case files.	PGM	\$265	\$27
2/19/2014	0.1	Correspond with analyst regarding hours.	JGB	\$690	\$69
2/19/2014	0.1	Correspond with case team regarding hours worked on case.	PGM	\$265	\$27
2/20/2014	0.2	Correspond with potential class member; update class member database.	PGM	\$265	\$53
2/21/2014	0.1	Complete weekly update, review, and organization of case files.	PGM	\$265	\$27
2/26/2014	0.1	Correspond with analyst regarding Illinois action counsel.	JGB	\$690	\$69
2/26/2014	0.1	Obtain lawyer information.	PGM	\$265	\$27
2/27/2014	0.3	Correspond with potential class members.	PGM	\$265	\$80
2/28/2014	0.1	Complete weekly update, review, and organization of documents.	PGM	\$265	\$27

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/3/2014	0.8	Monthly review of documents, filings, contacts, and other summary and general case information; correspond with potential class members.	PGM	\$265	\$212
3/4/2014	1.1	Correspond with potential class members; update class member database.	PGM	\$265	\$292
3/6/2014	0.1	Correspond with analyst regarding potential class member.	JGB	\$690	\$69
3/6/2014	0.1	E-mail exchange with JB's office re new client for class action - Patricia Tyler	JLN	\$520	\$52
3/6/2014	0.9	Correspond with potential class members.	PGM	\$265	\$239
3/7/2014	0.2	Complete weekly organization, review, and update of case files; correspond with potential class member.	PGM	\$265	\$53
3/10/2014	0.3	Correspond with potential class member.	PGM	\$265	\$80
3/12/2014	0.1	Meet with PGM to discuss next steps: client follow up.	KK	\$385	\$39
3/13/2014	0.1	Correspond with potential class member.	PGM	\$265	\$27
3/14/2014	0.2	Complete weekly review, organization, and update of case files; correspond with potential class member.	PGM	\$265	\$53
3/14/2014	0.1	Discuss with PGM re: correspondence with class members.	SS	\$340	\$34
3/18/2014	0.1	Correspond with analyst regarding potential class member.	JGB	\$690	\$69
3/18/2014	0.1	Correspond with potential client.	PGM	\$265	\$27
3/19/2014	0.6	Correspond with potential class members.	PGM	\$265	\$159
3/20/2014	0.1	Meet with PGM to discuss next steps: class member follow-up.	KK	\$385	\$39

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/21/2014	0.2	Complete weekly review, update, and organization of case files; correspond with potential client.	PGM	\$265	\$53
3/21/2014	0.1	E-mail exchange with JB's office re new client for class action - Rebecca Lewis	JLN	\$520	\$52
3/25/2014	0.7	Correspond with potential class members.	PGM	\$265	\$186
3/27/2014	0.1	Meet with PGM regarding next steps: engagement letters.	KK	\$385	\$39
3/28/2014	1.4	Correspond with potential client; draft engagement letter; complete weekly update, review, and organization of case files.	PGM	\$265	\$371
4/1/2014	0.1	Correspond with class member.	PGM	\$265	\$27
4/3/2014	0.2	Respond to inquiry.	PGM	\$265	\$53
4/8/2014	0.1	Corresponded with analyst regarding client question.	JGB	\$690	\$69
4/8/2014	0.2	Correspond with class member.	PGM	\$265	\$53
4/11/2014	0.2	Discuss responses to class-action clients with PGM	PGP	\$265	\$53
4/11/2014	0.1	Complete weekly, update, review, and organization of documents.	PGM	\$265	\$27
4/11/2014	0.1	E-mail exchange with JB's office re new client for class action - Aikta Jan	JLN	\$520	\$52
4/14/2014	0.1	Sort, save, and code phone note.	MMH	\$265	\$27
4/17/2014	0.2	Send declination of representation notice	PGP	\$265	\$53
4/24/2014	0.2	Discuss with PGM re: follow up with potential class members; discuss promotion material.	SS	\$340	\$68
4/25/2014	0.9	Complete weekly update, review, and organization of case files; correspond with potential class members.	PGM	\$265	\$239

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/25/2014	0.1	Discuss with PGM re: following up further with potential class members.	SS	\$340	\$34
4/29/2014	0.1	E-mail exchange with JB's office re filing Notice of Address Change	JLN	\$520	\$52
4/29/2014	0.1	Meet with PGM to discuss next steps: client follow up.	KK	\$385	\$39
4/29/2014	0.3	Follow up with potential class members.	PGM	\$265	\$80
5/2/2014	0.1	Correspond with potential class member; complete weekly update, review, and organization of case files.	PGM	\$265	\$27
5/6/2014	0.1	Sort, save, and code documents into firm's practice management and documents database.	PGM	\$265	\$27
5/6/2014	0.1	Discuss with PGM re: correspondence with class members.	SS	\$340	\$34
5/8/2014	0.5	Review messages from reporter; correspond with case team regarding same; phone call with reporter.	JGB	\$690	\$345
5/8/2014	0.2	Sort, save, and code documents into firm's practice management and documents database.	PGM	\$265	\$53
5/9/2014	0.2	Conduct weekly update, review, and organization of case files; enter phone note.	PGM	\$265	\$53
5/12/2014	0.7	Review IL matter; discuss with IL counsel; follow up with case team.	JGB	\$690	\$483
5/12/2014	2.1	Reviewed Affidavit Motion under Rule 23(f); did preliminary research based on case law cited in brief	JLN	\$520	\$1,092
5/14/2014	3.8	Correspond with co-counsel and case team regarding court decision; review court decision; draft update to class; emails to and from class members; discuss with colleagues next steps in the matter.	JGB	\$690	\$2,622

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/14/2014	0.6	Reviewed Opinion & Order certifying class	JLN	\$520	\$312
5/14/2014	2.25	Researched potential appeals by defendants under Rule 23 (f)	JLN	\$520	\$1,170
5/14/2014	0.4	Meeting with JB re: Judge Stein's decision & next steps for moving forward	JLN	\$520	\$208
5/14/2014	0.2	E-mail exchange with JB & class regarding Judge Stein's ruling certifying the class	JLN	\$520	\$104
5/14/2014	0.8	Review decision granting class certification; discuss same with JGB; email exchange with JGB re: same.	SS	\$340	\$272
5/14/2014	1.6	Correspond with case team regarding class certification; edit and send update to class members; update class member database.	PGM	\$265	\$424
5/15/2014	2.6	Discuss next steps with co-counsel; correspond with reporter regarding class certification; correspond with analyst regarding damages; review earlier declarations and court filings	JGB	\$690	\$1,794
5/15/2014	0.1	Meet with PGM regarding next steps: following up with class members; damages calculations.	KK	\$385	\$39
5/15/2014	0.1	E-mail from and to Balestriere's office re new client for class action - Allisa Pollack	JLN	\$520	\$52
5/15/2014	2.9	Sort, save, and code documents into firm's practice management and documents database; discovery review; correspond with client regarding errata; finalize letters and correspond with opposing counsel.	PGM	\$265	\$769
5/15/2014	3.1	Update class member list; review correspondence; estimate damages; research valuation; correspond with potential class members.	PGM	\$265	\$822
5/15/2014	0.2	Discuss with PGM re: correspondence with class members; review email exchange re: same.	SS	\$340	\$68

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/16/2014	0.1	Correspond with opposing counsel regarding potential resolution; emails to and from class members.	JGB	\$690	\$69
5/16/2014	1.2	Complete weekly update, review, and organization of case files; discuss notice and class issues with SS; research valuation; correspond with class members.	PGM	\$265	\$318
5/16/2014	1.2	Discuss with JGB re: reaching out to notice provider service about notice to class members; research re: same.	SS	\$340	\$408
5/19/2014	1.3	Research and review judge's previously approved settlements; discuss same with PGM; discuss with JGB re: conference scheduled in Illinois re: lead counsel; discuss with PGM re: notice to class members.	SS	\$340	\$442
5/19/2014	1.4	Research class action settlement decisions; correspond with opposing counsel regarding call; draft class member notice.	PGM	\$265	\$371
5/19/2014	0.6	Review earlier notices of settlement; emails to and from defense counsel re: settlement discussion; discuss settlement with colleagues	JGB	\$690	\$414
5/20/2014	2.9	Correspond with opposing counsel regarding scheduling of call; discuss next steps with SS; re-review decision; review older discovery; discuss settlement with colleagues; voice message for adversary: discuss notice with case team.	JGB	\$690	\$2,001
5/20/2014	2.6	Researched issue piercing corporate veil under state & fed law re: holding Riverside responsible	JLN	\$520	\$1,352
5/20/2014	0.6	Discuss status and notice with SS.	PGM	\$265	\$159

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/20/2014	5.8	Discuss with PGM re: following up with class members; research re: previous settlements and attorneys' fees determinations; discuss same with JGB; discuss with JGB re: interrogatories and damages calculation; review action filed against defendant in Illinois; edit notice to class draft and email same to JGB; discuss same with PGM; discuss with MJN re: ability to post opt-out form on firm's website; email to PGM re: sample opt-out form.	SS	\$340	\$1,972
5/21/2014	1.6	Review letter to opposing counsel; correspond with case team regarding same; discuss settlement issues with SS	JGB	\$690	\$1,104
5/21/2014	1.6	Draft letter to opposing counsel; research discovery history; send letter to opposing counsel.	PGM	\$265	\$424
5/21/2014	5.8	Review discovery demands and production for purpose of follow up letter to opposing counsel re: continuing obligation to produce information re: number of customers; discuss same with JGB and PGM; discuss notice requirements and costs with JGB; call to notice agency re: same; research re: electronic notice; edit letter to opposing counsel re: interrogatories responses; discuss same and documents to enclose with PGM.	SS	\$340	\$1,972
5/22/2014	2.4	Complete weekly update, organization, and review of case files; correspond with class members; draft opt out notice.	PGM	\$265	\$636
5/22/2014	1.6	Phone call with opposing counsel; correspond with case team case status; review earlier settlement orders.	JGB	\$690	\$1,104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/22/2014	3.4	Call to opposing counsel re: settlement; discuss same with JGB; email exchange with cocounsel re: same; email exchange with outside notice provider company re: phone conference; additional research re: email notice and discuss same with KK; discuss with PGM re: opt-out form and edit same; discuss with PGM re: correspondence with named plaintiff and edit email re: same.	SS	\$340	\$1,156
5/23/2014	3.1	Review email correspondence with cocounsel re: settlement, notice, and appeal; email exchange with notice agency re: proceeding with notice; discuss same with JGB; review piercing of corporate veil caselaw received from cocounsel; discuss with MJN re: Dropbox; review Dropbox and update JGB re: same.	SS	\$340	\$1,054
5/23/2014	1.9	Discuss with notice firm next steps; review notice; discuss with outside counsel settlement strategies.	JGB	\$690	\$1,311
5/27/2014	0.2	Discuss with CT re: status of case and next steps.	SS	\$340	\$68
5/27/2014	1.4	Review class notice documents; correspond with case team regarding next steps; discuss settlement with outside lawyer.	JGB	\$690	\$966
5/27/2014	2.4	Talk to SS about status of case and next steps; review complaint, plaintiff's brief, SDNY decision, and appellate decision.	CT	\$265	\$636
5/27/2014	0.1	Discuss next steps with PGM: sending class notice, following up with class members.	KK	\$385	\$39
5/27/2014	1.8	Sort, save, and code documents into firm's practice management and documents database; research company complaint websites; communicate with class members.	PGM	\$265	\$477
5/28/2014	0.1	Correspond with analyst regarding class members.	JGB	\$690	\$69
5/28/2014	0.7	Correspond with class members.	PGM	\$265	\$186

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/29/2014	5.6	Draft correspondence to opposing counsel; review class certification appeal and order; research e-Harmony and draft investigations memo; draft correspondence to Illinois court; discuss appeal opposition with case team; adjust appeal notification preferences.	PGM	\$265	\$1,484
5/29/2014	2.1	Meet with SS to discuss next steps for reply to appeal; worked on table of contents.	CT	\$0	\$0
5/29/2014	0.8	Review background facts; discussed case with PGM.	CT	\$265	\$212
5/29/2014	2.5	Review background facts; meet with SS to discuss next steps for reply to appeal.	CT	\$0	\$0
5/29/2014	1.7	Correspond with case team regarding class notices, appeal, and Illinois action; edit letter to court; correspond with opposing counsel regarding phone call; review petition.	JGB	\$690	\$1,173
5/29/2014	3.8	Edit and draft email to opposing counsel re: status of discovery responses; edit and draft email to opposing counsel re: notice to class members and discuss same with PGM; edit and draft letter to court in Illinois re: status update; discuss with JGB re: upcoming tasks; meet with CT and PGM re: petition to appeal; review same; discuss with PGM re: timeline for opposition; review investigation memo re: other potential similar actions.	SS	\$340	\$1,292
5/29/2014	1.8	Researched general standards of review for Rule 23(f) appeals & cases interpreting same.	JLN	\$520	\$936
5/29/2014	1.4	Researched standard of review for certification orders	JLN	\$520	\$728
5/29/2014	1.6	Read defendants' motion filed under Rule 23(f) seeking interlocutory review of cert. order; began preliminary research into cases cited by defendants.	JLN	\$520	\$832

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/29/2014	2.4	Continued researching case law cited by defendants in their brief	JLN	\$520	\$1,248
5/30/2014	3.8	Review and edit motion memo; call with opposing counsel re: discovery and settlement; discuss same with JGB and JN; email to JN re: opposition brief; research re: same.	SS	\$340	\$1,292
5/30/2014	4.3	Complete weekly review, update, and organization of case files; update motion memo and review second circuit rules; correspond with class members; finalize letter to Illinois Court and send letter; close out investigation.	PGM	\$265	\$1,140
5/30/2014	1.9	Phone call with opposing counsel regarding case status; discuss next steps with case team; review investigations memo; review updated motion memo; review appeal papers; review notices.	JGB	\$690	\$1,311
5/30/2014	3.4	Researched 2d Cir. case law re: fraud class actions based on uniform misrepresentations	JLN	\$520	\$1,768
5/30/2014	2.7	Researched issue of reliance & generalized proof	JLN	\$520	\$1,404
5/30/2014	1.9	Continued research re: reliance/generalized proof	JLN	\$520	\$988
5/30/2014	0.4	Meeting with JB re: telecon with defense counsel and next steps for moving forward	JLN	\$520	\$208
5/30/2014	0.4	Meeting w/JB & SS re: telecon w/defense counsel, expected time-frame for draft of opposition brief & next steps for moving forward.	JLN	\$520	\$208
5/31/2014	1.3	Began drafting preliminary statement	JLN	\$520	\$676
5/31/2014	3.1	Continued drafting preliminary statement; added key factual findings of court into preliminary statement NY claims under GBL 349 & Unjust enrichment	JLN	\$520	\$1,612
5/31/2014	1.1	Finished draft of preliminary statement; made edits/revisions to same	JLN	\$520	\$572

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/31/2014	2.6	Researched issue of whether variations in state law bar certification of national class	JLN	\$520	\$1,352
5/31/2014	1.8	Researched issue of whether variations in individual damage claims preclude national certification	JLN	\$520	\$936
6/1/2014	1.4	Drafted standard of review section for Rule 23(f)	JLN	\$520	\$728
6/1/2014	1.1	Drafted standard of review section for certifications orders in general	JLN	\$520	\$572
6/2/2014	1.6	Review petition standard; review previous class cert decisions; email exchange with adversary; prep for call with adversary.	JGB	\$690	\$1,104
6/2/2014	0.1	Discuss next steps with PGM.	JLM	\$385	\$39
6/2/2014	1.8	Discuss with PGM re: supplemental letter to court and opposing counsel re: court order; discuss with CT re: work on opposition to petition for appeal; email exchange with notice company and discuss giving update with JGB; email exchange with opposing counsel re: call and discuss same with JGB; discuss going forward with JGB over lunch; research and review timeline in similar consumer fraud class actions.	SS	\$340	\$612
6/2/2014	0.6	Draft and send letter and enclosures to Illinois court.	PGM	\$265	\$159
6/2/2014	3.3	Began drafting section re: fraud claim based on uniform misrepresentations that were made to all class members	JLN	\$520	\$1,716
6/2/2014	4.2	Continued work on section: re uniform misrepresentations made to all members	JLN	\$520	\$2,184
6/2/2014	3.7	Finished section re: uniform misrepresentations to all class members	JLN	\$520	\$1,924
6/2/2014	0.1	Email case team week plan	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/3/2014	1.8	Participate in conference call with opposing counsel; correspond with case team regarding class notice; discuss next steps with case team; review petition standards; discuss possible settlement strategy with outside counsel.	JGB	\$690	\$1,242
6/3/2014	0.1	Organize case files	KMB	\$265	\$27
6/3/2014	2.1	Call with opposing counsel re: settlement, notice, and number of class members; email exchange with JGB and opposing counsel re: notice draft; discuss same with PGM; email exchange with opposing counsel re: request for adjournment; email exchange with cocounsel re: update; discuss with JGB re: update to notice provider company and email re: same.	SS	\$340	\$714
6/3/2014	0.1	Meet with CT regarding next steps: respondent brief for appeal.	KK	\$385	\$39
6/3/2014	0.5	Sort, save, and code documents into firm's practice management and documents database; attend phone call regarding case status with opposing counsel; correspond with class members.	PGM	\$265	\$133
6/3/2014	3.9	Continued working on section re: reliance & generalized proof	JLN	\$520	\$2,028
6/3/2014	1.3	Finished section re: reliance & generalized proof	JLN	\$520	\$676
6/3/2014	0.5	Drafted section: re Christine Rodriguez & her alleged lack of reliance	JLN	\$520	\$260
6/3/2014	3.8	Began draft section re: establishing reliance by generalized proof	JLN	\$520	\$1,976
6/4/2014	1.2	Correspond with case team regarding appeal schedule; correspond with co-counsel regarding appeal opposition; review decisions on similar petitions.	JGB	\$690	\$828
6/4/2014	0.7	Update court binder	KMB	\$265	\$186

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/4/2014	2.6	Email exchange with cocounsel re: opposition to petition to appeal; discuss same with JGB; discuss filing procedure with PGM; review filing requirements and discuss with PGM re: follow up with printers; meet with PGM to discuss class member communication; discuss firm's eligibility to bring individual unrelated action against same defendant; research re: same.	SS	\$340	\$884
6/4/2014	2.7	Began working on section re: state law variations do not preclude certification	JLN	\$520	\$1,404
6/4/2014	1.9	Finished section re: state law variations do not preclude certification	JLN	\$520	\$988
6/4/2014	2.4	Began working on section re: varying statutes of limitations do not preclude certification	JLN	\$520	\$1,248
6/4/2014	2.5	Finished section re: variations in SOL's do not preclude certification	JLN	\$520	\$1,300
6/4/2014	2.8	Drafted section re: variations in damages do not preclude certification	JLN	\$520	\$1,456
6/4/2014	1.3	Sort, save, and code documents into firm's practice management and documents database; correspond with class members.	PGM	\$265	\$345
6/5/2014	1.7	Correspond with case team regarding opposition to appeal; review draft of opposition to appeal; call other plaintiff counsel on related matter regarding case status.	JGB	\$690	\$1,173
6/5/2014	0.5	Update court binder	KMB	\$265	\$133
6/5/2014	5.6	Arrange logistics with appellate printers; correspond with court regarding filing; draft case status update; save, sort, and code documents into firm's electronic management system; discuss former employee with SS; call former employee; edit opposition brief.	PGM	\$265	\$1,484

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/5/2014	4.6	Discuss with PGM re: letter to potential class member; discuss with PGM re: evidence from former employee; email exchange with cocounsel and case team re: draft of opposition to petition to appeal; review and edit same and discuss with PGM; discuss with PGM re: printing requirements and compliance.	SS	\$340	\$1,564
6/5/2014	0.1	Sent over draft of brief in present form to JB	JLN	\$520	\$52
6/5/2014	0.1	Read e-mail from JB re: his initial thoughts about brief	JLN	\$520	\$52
6/5/2014	2.3	Drafted section re: Rule 23(f) is not warranted where at most order will be modified but not reversed	JLN	\$520	\$1,196
6/5/2014	1.5	Began drafting section re: IJL's admitted policy of overcharging NY residents makes case ideally suited for class treatment	JLN	\$520	\$780
6/5/2014	2.8	Continued drafting section re: IJL's admitted policy of overcharging NY residents makes case suited for class treatment	JLN	\$520	\$1,456
6/5/2014	2.6	Finished drafting section re: IJL's admitted policy of overcharging NY residents makes case ideally suited for class treatment	JLN	\$520	\$1,352
6/5/2014	2.3	Drafted section re: defendants failure to challenge unjust enrichment claim & waiver of same as a result	JLN	\$520	\$1,196
6/6/2014	5.6	Review changes to proposed notice and discuss same with PGM; review cocounsel's version of opposition to petition to appeal; edit same; discuss same with JGB; insert comments and email same to JGB.	SS	\$340	\$1,904
6/6/2014	1.4	Correspond with case team regarding appeal; review draft brief.	JGB	\$690	\$966
6/6/2014	4.9	Review source citations; distinguish cases; discuss assignment with SS.	CT	\$265	\$1,299

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/6/2014	0.2	Drafted conclusion section of brief	JLN	\$520	\$104
6/6/2014	2.4	Made extensive revisions, edits, additions & deletions to draft brief	JLN	\$520	\$1,248
6/6/2014	4.3	Continued making edits/revisions to draft 23(f) opp. brief	JLN	\$520	\$2,236
6/6/2014	3.75	Finished edits to 23(f) opp brief; sent to JB	JLN	\$520	\$1,950
6/6/2014	2.2	Drafted section re: defendants' failure to demonstrate that the certification order involves novel questions of law that require immediate resolution.	JLN	\$520	\$1,144
6/6/2014	7	Complete weekly review, update and organization of case files; edit opposition to appeal; create logistics plan; assemble exhibits; correspond with class member; cite check.	PGM	\$265	\$1,855
6/7/2014	0.8	Review hours summary; review previous 23f petitions	JGB	\$690	\$552
6/8/2014	5.8	Review, draft, and edit opposition to petition in Court of Appeals	JGB	\$690	\$4,002
6/8/2014	12.2	Edit and draft opposition to petition for appeal; review cases cited in petition; discuss same with JGB; review JGB's edits and discuss same; draft additional section of brief; discuss with JGB my comments to proposed notice and edit notice; email to attorneys in the firm re: distinguishing cases first thing on Monday and email petition and draft opposition.	SS	\$340	\$4,148
6/9/2014	4.1	Correspond with case team regarding appeal petition; review and edit appeal opposition papers.	JGB	\$690	\$2,829
6/9/2014	0.4	Line edit petition to appeal opposition brief.	MMH	\$265	\$106
6/9/2014	4.1	Distinguish opposition cases; check source citations.	CT	\$0	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/9/2014	6.9	Contact court regarding appeal; edit appeal brief, monthly update, and class notice; correspond with class members; correspond with appellate printers; file opposition to petition to appeal.	PGM	\$265	\$1,829
6/9/2014	7.2	Edit and draft brief; discuss with PGM re: filing procedure; correspondance with printing company re: same; discuss with CT and TJF re: distinguishing cases for brief; discuss edits with JGB adn insert his edits; discuss with PGM re: citing to appendix; review incorrect filing and discuss same with PGM; discuss cover page with printing company and edit same; discuss amending caption with JGB.	SS	\$340	\$2,448
6/9/2014	2.6	Review filings; conduct legal research and distinguish authorities.	TJF	\$405	\$1,053
6/9/2014	1.4	Review petition and opposition brief; edit opposition brief.	JLM	\$385	\$539
6/9/2014	0.2	E-Mail exchange w JB re: status of brief & substantial edits	JLN	\$520	\$104
6/9/2014	0.4	Read final version of 23(f) Opposition Brief	JLN	\$520	\$208
6/9/2014	0.3	e-mail exchange w/JB re: reviewing brief prior to filing if substantive changes are made	JLN	\$520	\$156
6/10/2014	0.8	Discuss employee documentation with case team; review notice	JGB	\$690	\$552
6/10/2014	3.4	Discuss with JGB and PGM re: filing notice; dsicuss with PGM re: formating of notice and method of filing; discuss with PGM re: calls to court re: same; email exchange with JGB and PGM re: following up with third party re: general information about case; dsicuss correspondance with former employee of defendant with PGM and JGB; review motion to stay and email exchange with JGB re: same.	SS	\$340	\$1,156

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/10/2014	2.4	Legal research re: case law cited in defense motion and additional cases re: Standards for Stay	JLN	\$520	\$1,248
6/10/2014	0.1	Read Notice of Motion for Stay and accompanying affidavit of Melissa Brown (IJL Prez)	JLN	\$520	\$52
6/10/2014	0.3	Read Memo of Law in Support of Motion to Stay proceedings	JLN	\$520	\$156
6/10/2014	3.9	Contact court regarding filing of notice; correspond with class members; research class certification limitations.	PGM	\$265	\$1,034
6/10/2014	0.1	Meet with PGM to discuss next steps: class notice.	KK	\$385	\$39
6/11/2014	3.1	Draft memo for opposition to stay; discuss with SS about memo for opposition to stay; research of stay pending appeal.	CT	\$265	\$822
6/11/2014	1.3	Correspond with case team regarding motion to stay; review motion papers and order	JGB	\$690	\$897
6/11/2014	0.1	Review of Judge Stein's denial of defendant's Stay petition; e-mail exchange w/ JB re: same	JLN	\$520	\$52
6/11/2014	7.1	Discuss motion to stay with SS; draft motion memo; save, sort, and code documents into firm's electronic management system.	PGM	\$265	\$1,882
6/11/2014	3.9	Discuss with case team opposition to motion to stay pending appeal; discuss procedural rules and motion memo with PGM; research and draft brief in opposition; review denial of stay motion and discuss same with case team and cocounsel; email exchange with JGB and PGM re: having draft of opposition ready for circuit court motion to stay; discuss same with CT; discuss with JGB re: editing engagement letter to include litigation hold language.	SS	\$340	\$1,326
6/12/2014	5.9	Draft memo for opposition to stay; discuss with SS about memo for opposition to stay; edited memo for opposition to stay.	CT	\$265	\$1,564

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/12/2014	2.6	Review billing entries; correspond with potential class members; reactivate staff on billing entries; edit engagement letter.	PGM	\$265	\$689
6/13/2014	0.4	Edit memo for opposition to stay appeal.	CT	\$265	\$106
6/13/2014	0.9	Complete weekly review, update, and organization of case file; correspond with case team regarding hours; review billing entries for correct formatting; save, sort, and code documents into firm's electronic management system.	PGM	\$265	\$239
6/13/2014	0.4	Follow up with case team re: hours and next steps.	JGB	\$690	\$276
6/15/2014	0.7	Review plan for next steps; review filings since class cert order; discuss with outside attorney	JGB	\$690	\$483
6/16/2014	1.3	Discuss with PGM re: correspondance with potential class member and her arbitration with IJL through BBB; discuss with PGM re: following up with court re: notice.	SS	\$340	\$442
6/16/2014	0.2	Discuss status of class notice with SS; discuss response to class member with SS.	PGM	\$265	\$53
6/17/2014	1.1	Correspond with potential class members; contact court regarding reply.	PGM	\$265	\$292
6/17/2014	0.8	Discuss with PGM re: update to potential class member and follow up to phone calls re: same; discuss with PGM re: call to court re: reply date and if one is permitted.	SS	\$340	\$272
6/18/2014	1.4	Correspond with case team regarding billing entries and next steps; review court rules; review Second Circuit petitions.	JGB	\$690	\$966
6/18/2014	0.4	Correspond with SS regarding case status and next steps; review class representatives; update calendar.	PGM	\$265	\$106

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/18/2014	0.5	Discuss with PGM re: update from Illinois action and PA update; discuss same with JGB; discuss potential summary judgment motion and hours review with JGB.	SS	\$340	\$170
6/19/2014	1.6	Correspond with case team regarding hours and calendaring of court of appeals motion; review settlement possibilities and discuss with outside lawyer; confirm appeal schedule.	JGB	\$690	\$1,104
6/19/2014	0.2	Reviewed emails to and from PGM re: new client.	JLN	\$570	\$114
6/19/2014	0.2	Email exchange with PGM and JGB re: review of hour entries; discuss same with PGM.	SS	\$340	\$68
6/19/2014	3.8	Review and edit billing entries; save, sort, and code documents into firm's electronic management system; review calendar notice and contact court regarding same; correspond with class member.	PGM	\$265	\$1,007
6/20/2014	1.4	Correspond with case team and opposing counsel regarding settlement discussions and billing; review magistrate rules and settlement issues.	JGB	\$690	\$966
6/20/2014	0.2	Reviewed email exchange between JGB and opposing counsel re: joint settlement case.	JLN	\$570	\$114
6/20/2014	1.7	Review research re: loadstar calculation from cocounsel; discuss with PGM re: hour entries review and email exchange with case team re: same; email exchange with opposing counsel re: scheduling phone call.	SS	\$340	\$578
6/20/2014	1.9	Complete weekly update, organization, and review of case files; phone class with class member; edit billing statements; discuss mediator question with SS; research SDNY mediation procedures; correspond with case team regarding billing entry review plan.	PGM	\$265	\$504
6/22/2014	2.3	Review correspondence with class reps; detailed email to class reps; emails to and from class reps and case team re: next steps and settlement.	JGB	\$690	\$1,587

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/22/2014	0.1	Reviewed email exchange between JGB and Malak-Rocuch re: possible settlement opinions.	JLN	\$570	\$57
6/23/2014	0.6	Correspond with potential class member; correspond with case team regarding pretrial conference; correspond with opposing counsel regarding conference.	JGB	\$690	\$414
6/23/2014	2.4	Discuss with PGM re: email exchange with potential class members and review language of same; review email exchange between JGB and potential class member; review email exchange between all named plaintiffs re: call to discuss mediation and notice; review email exchange with opposing counsel re: scheduling call conference; discuss with PGM re: logisitcs of same so to have cocounsel on call; review court's order re: court conference; dsicuss same with PGM and email exchange with JGB re: same; review potantial matter and discuss with PGM re: intake memo for same.	SS	\$340	\$816
6/23/2014	0.2	Reviewed order setting pretrial conf to 7-29-14; Reviewed email exchange to opposing counsel and JGB regarding call.	JLN	\$570	\$114
6/23/2014	3.3	Correspond with class members; discuss plan with SS; edit billing entries.	PGM	\$265	\$875
6/24/2014	0.3	Correspond with case team and opposing counsel regarding conference call scheduling.	JGB	\$690	\$207
6/24/2014	1.4	Edit message to potential class members; edit billing entries.	PGM	\$265	\$371
6/24/2014	2.7	Discuss with PGM re: intake memo on similar class action; email exchange with JGB, cocounsel, and opposing counsel re: phone call; call to cocounsel re: same; review email language to certain group of potential class members and discuss aspects of it with PGM; review cases re: determining loadstar when fee amounts change over years.	SS	\$340	\$918

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/25/2014	1.8	Research, edit, and draft memo re: loadstar and discuss same with PGM; email to JGB re: same; discuss with PGM re: correspondance with a class member.	SS	\$340	\$612
6/25/2014	2.7	Research lodestar calculations and draft memo; correspond with potential class member.	PGM	\$265	\$716
6/25/2014	0.4	Review memo on settlement issues.	JGB	\$690	\$276
6/26/2014	0.9	Conference call with case team and opposing counsel regarding potential mediation and settlement discussions; discuss settlement options with partner.	JGB	\$690	\$621
6/26/2014	2.4	Discuss with PGM re: correspondance with potential class members and conference call with appointed class representatives; dsicuss with case team re: call with opposing counsel; call with opposing counsel re: mediation and meet wit cocounsel re: same; dsicuss same with JGB; email exchange with JGB re: loadstar memo.	SS	\$340	\$816
6/26/2014	2	Correspond with potential class members; update class database; attempt intake of potential dating services fraud matter; attend conference call regarding potential settlement discussions.	PGM	\$265	\$530
6/27/2014	1.3	Conduct conference call with lead plaintiffs; discuss settlement and other issues with case team, including statute of limitations and parent company.	JGB	\$690	\$897
6/27/2014	6.6	Research lodestar and percentage fees; speak with SS regarding research and memorandum format; draft memorandum on attorney fees for class actions; review edits for table of contents.	CT	\$265	\$1,749
6/27/2014	0.2	Reviewed email exchange re: pretrial conference on 6-29-14; reviewed email exchange regarding moderator information for call.	JLN	\$570	\$114

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/27/2014	1.6	Complete weekly update, review, and organization of case files; schedule conference call; meet with SS regarding lodestar calculations; attend and document conference call.	PGM	\$265	\$424
6/27/2014	1.8	Discuss with CT re: memo on attorneys fees computation; review email exchange with cocounsel re: call with class members; discuss with PGM re: follow up with class members; prepare for phone call with class representatives and attend same; discuss with case team re: same after call; review email exchange with class members and discuss same with JGB.	SS	\$340	\$612
6/29/2014	0.1	Review and comment on plan memo	JGB	\$690	\$69
6/30/2014	0.2	Meet with SS to discuss case plan; draft monthly update to the class.	PGM	\$265	\$53
6/30/2014	5.4	Research computation of lodestar fees; draft memorandum on attorney fees for class actions.	CT	\$265	\$1,431
6/30/2014	0.1	Discuss next steps with PGM and CT.	JLM	\$385	\$39
6/30/2014	0.2	Review memo re: attorney's fees claculation and send email to CT re: same.	SS	\$340	\$68
7/1/2014	1.8	Draft attorney fee memorandum.	CT	\$265	\$477
7/1/2014	0.1	Meet with CT regarding next steps: attorneys' fees memorandum.	KK	\$385	\$39
7/1/2014	0.1	Meet with PGM regarding next steps: reviewing billing records and following up with class members.	KK	\$385	\$39
7/1/2014	2.2	Conduct intake regarding California Singles; reconcile duplicate billing entries; correspond with potential class members.	PGM	\$265	\$583
7/2/2014	2.2	Edit attorney fee memorandum; updated bill of cost table in case summary memorandum.	CT	\$265	\$583

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/2/2014	0.4	Correspond with case team regarding damages calculations; correspond with potential class member.	JGB	\$690	\$276
7/2/2014	0.2	Reviewed emails from JGB re: financials.	JLN	\$570	\$114
7/2/2014	2.4	Review and edit monthly update to clients; review and edit correspondence with specific class members and potential class members; email exchange with JGB and cocounsel re:updated discovery information from defendants; discuss sending updated plan email to JGB with PGM.	SS	\$340	\$816
7/2/2014	1.9	Work with SS to create plan for next steps in case; correspond with potential class members.	PGM	\$265	\$504
7/3/2014	0.5	Correspond with case team and opposing counsel regarding possible mediation and settlement; correspond with case team regarding request for financial records.	JGB	\$690	\$345
7/3/2014	0.1	Discuss with SS re editing attorney fees memo to include additional section.	CT	\$265	\$27
7/3/2014	1.7	Complete weekly update, review, and organization of case files; review taxable costs; follow up with class members; review financial statements; draft and send letter to opposing counsel regarding financial statements.	PGM	\$265	\$451
7/3/2014	1.4	Discuss with CT re: editing fees memo to include additional section; discuss with PGM re: bill of costs; review email exchange re: same; review plan email and edit monthly update language to class members; review email exchange with opposing counsel re: mediation and settlement and discuss same with cocounsel and JGB.	SS	\$340	\$476
7/4/2014	0.4	Lay out next steps and advise thoughts on case plan memo	JGB	\$690	\$276
7/5/2014	0.3	Review hours summaries and email case team re: follow up	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/7/2014	2.8	Draft second section of attorney fees memo; spoke with SS re attorney fee memo; made edits that SS suggested for memo.	CT	\$265	\$742
7/7/2014	0.9	Draft letter to court re: mediation and adjournment; discuss same with JGB and review correspondance with opposing counsel re: same.	SS	\$340	\$306
7/8/2014	0.5	Correspond with case team regarding adjournment notice to court; review and provide thoughts on letters.	JGB	\$690	\$345
7/8/2014	3.8	Review newly obtained discovery; edit letter to court re: mediation in light of opposing counsel's comments and JGB's edits; discuss same with JGB.	SS	\$340	\$1,292
7/9/2014	0.3	Correspond with case team regarding new disclosures.	JGB	\$690	\$207
7/9/2014	1.4	Discuss with PGM re: emails from IJL client from Canada and how to respond and proceed; review cocounsel's emails re: defendants' untimely dsicovery production and chellanging its admission; email exchange with case team re: same.	SS	\$340	\$476
7/9/2014	2.1	Compare old memo with new memo re attorney fees; research elements of fraud and unjust enrichment for summary judgment	CT	\$265	\$557
7/9/2014	0.3	Reviewed email exchange to and from JGB re: latest disclosures; reviewed letter from JGB to Court re: adjourning preliminary conference for settlement purposes.	JLN	\$570	\$171
7/9/2014	0.5	Correspond with class members; file letter with court regarding adjournment.	PGM	\$265	\$133

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/10/2014	2.8	Review orders from district court and second circuit and discuss next step with case team; review newly assigned magistrate judge's settlement rules; email opposing counsel re: adjournment of preliminary conference and proposed dates; draft letter to court re: same.	SS	\$340	\$952
7/10/2014	1.4	Correspond with case team regarding settlement and court orders regarding appeal and appointment of judges; review recent orders and discuss with colleagues	JGB	\$690	\$966
7/10/2014	1.8	Write and research if fraud and unjust enrichment claims are suitable for summary judgment.	CT	\$265	\$477
7/10/2014	0.3	Reviewed email from and to JGB re: win on appeal; new judge appointment; reviewed Mandate of USCA (Certified Copy) denying immediate appeal; reviewed Notice and Order of Reassignment to another Judge.	JLN	\$570	\$171
7/10/2014	0.9	Sort, save, and code documents into firm's practice management and documents database; correspond with potential class members; update calendars; draft update to class members; edit letter to court; discuss case status with case team.	PGM	\$265	\$239
7/11/2014	0.9	Discuss case status, mediation, and next steps with case team.	JGB	\$690	\$621
7/11/2014	0.4	Search for disclosures for class members	KMB	\$265	\$106
7/11/2014	3.2	Draft memorandum re summary judgment for claims; search for witness disclosures.	CT	\$265	\$848

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/11/2014	4.6	Discuss with PGM re: call to Court re: how to proceed with settlement conference; discuss same with JGB; review Court order re: calling to arrange for settlement conference; email exchange with opposing counsel re: same; dsicuss same with PGM and JGB; call to Court re: same; review newly produced discovery and disclosures and dsicuss with PGM and JGB re: motion in limine; discuss with CT re: same; discuss with PGM re: email to case team about plan on going forward and edit same; draft letter to court re: adjournment and edit same per JGB's edits; discuss same with PGM; discuss with PGM re: consolidating memos re: attorneys fees; discuss with CT re: memo on summary judgment.	SS	\$340	\$1,564
7/11/2014	0.1	Reviewed letter motion from JB to Court re adjourning conference and Order granting adjournment to 8-13-14.	JLN	\$570	\$57
7/11/2014	2.1	Complete weekly update, review, and organization of case files; edit and file letter with court; correspond with potential class members; discuss fees memo with SS: discuss meditation and next steps with case team.	PGM	\$265	\$557
7/12/2014	1.4	Review and comment on plan memo re: next steps; review previous order; lay out plan for coming weeks including mediation and notice issues; review previous confidential mediation statement and outline for such statement.	JGB	\$690	\$966
7/14/2014	0.7	Email exchange with co-counsel; review emails to clients; review follow up with defendants re: discovery; touch base with case team re: mediation.	JGB	\$690	\$483
7/14/2014	6.3	Draft motion in limine for failure to comply with discovery; speak to SS re motion in limine.	CT	\$265	\$1,670
7/14/2014	0.2	Reviewed email exchange to and from JGB re: call to Judge Netburn's Chambers.	JLN	\$570	\$114

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/14/2014	3.2	Discuss with CT re: drafting motion in limine; edit same and discuss edits with CT; discuss with PGM re: drafting confidential mediation statement; discuss with PGM re: potential action in Canada and lostics of bringing same; research re: same and email to JGB re: same; email exchange with opposing counsel and clients re: availability to call the court about settlement conference and scheduling fo same.	SS	\$340	\$1,088
7/14/2014	1.7	Review fees memo; research settlement and international franchise and discuss same with SS; correspond with counsel regarding supplemental production; correspond with lead plaintiffs regarding scheduling of mediation.	PGM	\$265	\$451
7/15/2014	1.1	Correspond with case team and lead plaintiffs regarding mediation; discuss motion in limine with SS.	JGB	\$690	\$759
7/15/2014	4.2	Draft and edit motion in limine; speak with SS re motion in limine.	CT	\$265	\$1,113
7/15/2014	1	Research re: preclusion of Canadian class action by US class action.	KLL	\$265	\$265
7/15/2014	0.2	Reviewed multiple e-mails between JGB, defense counsel and the clients re: upcoming mediation and scheduling issues and concerns.	JLN	\$570	\$114

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/15/2014	4.3	Call to court with opposing counsel and case team re: settlement conference; follow up with opposing counsel re: other available dates and call to court re: same; meet and exchange emails with case team re: same; discuss with case team re: issuing subpoenas to Defendant Riverside re: IJL's financials; discuss with PGM re: draft of confidential settlement letter and potential exhibits; review confidential settlement letter; discuss with PGM re: correspondance with class representatives and other class members; email exchange with company handling notices in preparation to preliminary conference re: conference call; draft and send email to case team re: taks and deadlines to complete going forward; email exchange with KLL re: research on whether we can file another action in Canada; discuss with CT re: motion in limine and edit same.	SS	\$340	\$1,462
7/15/2014	0.1	Meet with CT to discuss next steps: motion in limine.	KK	\$385	\$39
7/15/2014	0.1	Meet with CT to discuss next steps: motion in limine.	KK	\$385	\$39
7/15/2014	3.2	Contact court regarding scheduling of mediation call; review billing; correspond with potential class members.	PGM	\$265	\$848
7/15/2014	3.8	Edit brief in support of motion in limine; review previously filed discovery; discuss both with CT; discuss with PGM re: correspondance with IJL's former employees and potential class members; discuss with KLL re: research on filing class action in Canada involving same conduct; email exchange with JGB and opposing counsel re: call to court; discuss with PGM re: clients' availability; discuss with PGM re: confidential mediation statement.	SS	\$340	\$1,292

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/16/2014	0.9	Conference call with Court and defense counsel re: scheduling mediation with Magistrate Judge Netburn; meeting with JGB, SS, PGM re: best strategy for moving forward, getting updated financials for IJL and Riverside, and filing motion in limine for belated discovery; reviewed Settlement Conference Order re: 9-15-14 settlement conference.	JLN	\$570	\$513
7/16/2014	1.3	Call with MJ re mediation; discuss with case team next steps; review and respond to plan memo.	JGB	\$690	\$897
7/16/2014	4.2	Correspond with class members and case team regarding schedule; attend phone conference with court; discuss case strategy and mediation with case team; draft mediation statement.	PGM	\$265	\$1,113
7/17/2014	2.5	Draft and edit motion in limine for exclusion of evidence.	CT	\$265	\$663
7/17/2014	2	Discuss with PGM re: preparation for the call with notice company and prepare questions for same; conference call with notice company re: notice adequacy and handling status of limitations differences; review and edit subpoenas to Riverside re: IJL financials; discuss same with PGM; discuss with PGM re: call with potential class member; discuss with CT re: motion in limine; review PGM's email to class representatives re: conference call and discuss same with PGM.	SS	\$340	\$680
7/17/2014	3.7	Review and consolidate billing records; draft questions regarding class notice plan; attend phone call with notice vendor; correspond with potential class member; draft subpoenas.	PGM	\$265	\$981
7/18/2014	0.6	Edit motion in limine.	CT	\$265	\$159
7/18/2014	0.8	Discuss with PGM re: email exchange to notice company; review email exchange re: same and respond to emails; discuss with PGM re: correspondence with potential class members.	SS	\$340	\$272

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/18/2014	1.8	Adjust billing entries to facilitate import into billing system; send class notice to management company for review; correspond with class members; complete update, review, and organization of case files.	PGM	\$265	\$477
7/18/2014	0.1	Touch base with SS re: discovery and settlement issues	JGB	\$690	\$69
7/19/2014	0.9	Review discovery and settlement and notice issues; review correspondence with case team and administrator; email to case team re: plan to proceed	JGB	\$690	\$621
7/21/2014	1.4	Edit citations in research memo; meeting with SS.	KLL	\$265	\$371
7/21/2014	1	Update and reformat billing spreadsheet document re: JLN hours.	KLL	\$265	\$265
7/21/2014	0.4	Edit motion in limine.	CT	\$265	\$106
7/21/2014	0.5	Discuss with SS next steps	JGB	\$690	\$345
7/21/2014	1.8	Discuss with PGM re: outstanding discovery and following up about same with opposing counsel; discuss with PGM re: correspondence with former employee; research re: continuing obligations of subpoena after return date; review subpoena demands and discuss same with PGM.	SS	\$340	\$612
7/21/2014	2.5	Discuss with SS discovery, subpoenas and correspondence with former employee; research continuing obligations of subpoena; review documents produced by equity company; review subpoena demands.	PGM	\$265	\$663
7/22/2014	0.3	Reviewed email to and from JB re: updated discovery.	JLN	\$570	\$171

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/22/2014	2.9	Discuss with PGM re: correspondance with potential class members; review mediation statement draft, edit same, and discuss edits with PGM; discuss with PGM re: next step email to case team and draft same.	SS	\$0	\$0
7/22/2014	0.1	Meet with PGM regarding next steps: billing review.	KK	\$385	\$39
7/22/2014	4.6	Correspond with potential class members; review and edit hours for importing into firm's billing system; edit mediation statement.	PGM	\$265	\$1,219
7/23/2014	0.1	Reviewed email to and from JB re: meeting with Shapiro.	JLN	\$570	\$57
7/23/2014	0.3	Discuss with case team next steps re discovery and settlement.	JGB	\$690	\$207
7/23/2014	1.9	Edit mediation statement and discuss same with PGM; discuss with PGM re: letter to court re: class representatives' attendance; meet with PGM re: communication with class representatives.	SS	\$340	\$646
7/23/2014	3.1	Correspond with potential class members; discuss class member communication with SS; correspond with opposing counsel regarding financial information; discuss mediation statement and next steps with SS; edit mediation statement.	PGM	\$265	\$822
7/24/2014	0.1	Reviewed email exchange to PGM re: taxable costs.	JLN	\$570	\$57
7/24/2014	1.4	Edit motion in limine draft and discuss edits with PGM; edit mediation statement and discuss same with PGM; draft plan email re: taks to complete in upcoming weeks; edit email language to third party re: continuing subpoena obligations.	SS	\$340	\$476

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/24/2014	6.1	Edit mediation statement; draft plan email and letter regarding settlement appearance; edit motion in limine; discuss import of hours into firm's electronic billing system; email co-counsel regarding records of costs; review prior discovery production for motion in limine.	PGM	\$265	\$1,617
7/24/2014	0.8	Review and give edits on letter to Magistrate re settlement; review confidential memo; advise thoughts to case team on next steps.	JGB	\$690	\$552
7/25/2014	0.5	Update discovery binder.	KMB	\$265	\$133
7/25/2014	0.4	Review language regarding request for updated information from equity company.	JGB	\$690	\$276
7/25/2014	3.1	Research re: obtaining updated financial information; further research re: precluding certain evidence at trial; discuss with PGM re: correspondance with potential class members and reserving subpoenas to third party.	SS	\$340	\$1,054
7/25/2014	0.7	Complete weekly review, organization, and update of case files; discuss with SS follow-up with opposing counsel and equity company; review discovery document; discuss with MJN import of hours into firm's billing system; correspond with opposing counsel regarding mediation; correspond with counsel for equity company.	PGM	\$265	\$186
7/28/2014	2.2	Edit mediation statement and motion in limine; correspond with case team regarding same; correspond with case team regarding mediation; correspond with case team regarding class notice plan.	JGB	\$690	\$1,518
7/28/2014	0.3	Scan class member documents; save, sort, and code documents into firm's electronic management system.	KMB	\$265	\$80
7/28/2014	0.4	Combine all Plotkin jury tips into one PDF.	KLL	\$265	\$106

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/28/2014	3.9	Email exchange and conference call with outside notice company re: best way to proceed with notice distribution; discuss with notice company representatives re: drafting statement to present to court before preliminary conference; review edits to motion in limine and mediation statement and discuss same with PGM; review correspondence with opposing counsel re: clients' attendance at conference; edit letter to court re: same and exchange emails with JGB re: same.	SS	\$340	\$1,326
7/28/2014	4.4	Correspond with potential class members; attend conference call with class managements vendors; correspond with opposing counsel regarding mediation attendance and file letter with court regarding same; edit mediation statement and motion in limine.	PGM	\$265	\$1,166
7/29/2014	0.6	Correspond with case team regarding contact with attorney; correspond with attorney regarding defendants; email to case team re: trial and mediation issues.	JGB	\$690	\$414
7/29/2014	2.2	Review discovery for purpose of preparing mediation statement and computing damages; discuss with PGM re: same; call with class member and discuss with defendants' corporate structure.	SS	\$340	\$748
7/29/2014	0.1	Meet with PGM regarding next steps: class member follow up; mediations statement; calculation of damages; importing billing entries.	KK	\$385	\$39
7/29/2014	1.6	Correspond with potential class members; discuss mediation statement and motion in limine with SS; participate in conference call with attorney for IJL customer.	PGM	\$265	\$424
7/30/2014	0.9	Correspond with case team regarding mediation and appearance of parties; review court order.	JGB	\$690	\$621
7/30/2014	0.2	Update, archive, save, sort, and code files between Dropbox and the firm's electronic management system.	KMB	\$265	\$53

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/30/2014	0.2	Reviewed letter dated 7-28-14 from JGB to Court re appearance of Class Representatives at settlement conference and order granting same.	JLN	\$570	\$114
7/30/2014	4	Discuss mediation attendance with SS; research incentives for class representatives; edit mediation statement; research bankruptcy and equity company obligations.	PGM	\$265	\$1,060
7/30/2014	4.2	Edit mediation statement and discuss same with PGM; call to court re: mediation attendance and discuss same with case team; email to bankruptcy cocounsel re: affirmation to add to mediation statement; research re: private equity companies' liability when its portfolio company goes to bankruptcy and discuss same with PGM; discuss with CT re: district court's factual findings and using same for summary judgment motion.	SS	\$340	\$1,428
7/31/2014	0.7	Correspond with case team regarding updated disclosures; edit disclosure request; correspond with outside counsel regarding bankruptcy scenario; emails to case team re all of this.	JGB	\$690	\$483
7/31/2014	3.1	Discuss bankruptcy scenario with SS; correspond with class representatives; review discovery and mediation statement for drafting of updated disclosure request; edition motion in limine; edit disclosure request; correspond with co-counsel regarding motion in limine; monthly review of documents, filings, contacts, and other summary and general case information..	PGM	\$265	\$822
7/31/2014	7.8	Email exchange with cocounsel re: scenario in case defendants go into bankruptcy; review and edit email draft to class representatives re: availability for mediation conference and discuss same with PGM; edit mediation statement and draft letter to opposing counsel re: request for further disclosures; research re: caselaw granting motion in limine for delayed disclosures and edit motion in limine; discuss same with PGM and review email exchange with cocounsel re: same.	SS	\$340	\$2,652

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/31/2014	1.1	Update court binder.	KMB	\$265	\$292
7/31/2014	1.9	Review court decision to find findings of fact to support summary judgment motion.	CT	\$265	\$504
7/31/2014	0.1	Reviewed email exchange to and from PGM re: motion in limine.	JLN	\$570	\$57
8/1/2014	0.7	Correspond with class representative regarding mediation attendance; correspond with case team regarding case plan; review emails regarding motion for summary judgment and related issues.	JGB	\$690	\$483
8/1/2014	5.8	Research re: summary judgment possibility and discuss same with PGM; draft email to case team re: idea how to proceed with summary judgment; email to case team re: general plan for upcoming week; review previously filed motion for summary judgment and relevant discovery; discuss same with PGM; discuss with PGM re: following up on motion to limine draft; discuss with PGM re: class representatives incentive fees research.	SS	\$340	\$1,972
8/1/2014	4.2	Complete weekly update, review, and organization of case files; discuss claims research questions and needed information with SS; review class certification order for findings of fact; asses grounds for motion for summary judgment.	PGM	\$265	\$1,113
8/2/2014	0.1	Review MSJ email from SS.	JGB	\$690	\$69
8/3/2014	0.1	Touch base via email with SS on coming week priorities.	JGB	\$690	\$69
8/4/2014	4.1	Research and draft memo on whether conflict of interest occurs when same firm represents more than one class in the same action.	CT	\$265	\$1,087

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/4/2014	7.7	Email exchange with JLN re: edits to motion in limine; review same and discuss with PGM re: edits to brief; discuss with CT re: research about potential conflict of interest in having same counsel represent two classes in same action; review memo re: same, edit same, and discuss edits and further research with CT; discuss research re: incentive fees with PGM; draft motion for summary judgment on G.B.L. claim; discuss same with JGB; discuss with PGM re: correspondance with potential class members.	SS	\$340	\$2,618
8/4/2014	3.9	Discuss motion for summary judgment tasks with SS; draft monthly update; review motion for summary judgment rules; create template for motion for summary judgment brief; research incentive fees.	PGM	\$265	\$1,034
8/4/2014	0.7	Email case team re MSJ thoughts and analysis.	JGB	\$690	\$483
8/5/2014	0.4	Correspond with case team regarding settlement and updated disclosures request to opposing counsel.	JGB	\$690	\$276
8/5/2014	2.3	Research conflict of interest issues re: same firm representing two classes.	CT	\$265	\$610
8/5/2014	0.3	Reviewed numerous email to and from PGM re: class action suit.	JLN	\$570	\$171
8/5/2014	6.6	Research re: potential conflict of interests in representing both classes; discuss same with CT; edit mediation statement and discuss same with PGM; review prior motion for summary judgment, pleadings, and various orders re: present summary judgment motion; research re: motion for summary judgment on unjust enrichment claim; discuss with JGB re: follow up with defendant re: updated information and settlement negotiations; review documents sent by notice agency; discuss correspondance with opposition with JLN and email exchange with case team re: same; discuss with PGM re: size of New York class.	SS	\$340	\$2,244

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/5/2014	4.6	Review status of discovery requests and correspond with case team regarding same; research incentive fees; review class notice plan; correspond with potential class members; edit mediation statement and conduct research relevant to class claims.	PGM	\$265	\$1,219
8/6/2014	1.8	Correspond with case team regarding opposing counsel's communication regarding disclosures; review and edit motion I limine; review and edit mediation statement; review emails with adversary.	JGB	\$690	\$1,242
8/6/2014	1.2	Research re: limite fund class actions.	KLL	\$265	\$318
8/6/2014	7.6	Draft conflict of interest memorandum.	CT	\$265	\$2,014
8/6/2014	0.2	Reviewed email from and to SS re various concerns.	JLN	\$570	\$114
8/6/2014	4.3	Review research re: conflict of interests and edit memo re: same; research same independently and discuss with CT; email correspondance with opposing counsel re: lack of production and settlement discussions; review information that is still owed and follow up with opposing counsel re: same; continue research re: summary judgment.	SS	\$340	\$1,462
8/7/2014	1.2	Correspond with case team regarding non-party discovery request; review status of discovery and notice conference prep; email exchange with lawyer re private equity involvement.	JGB	\$690	\$828
8/7/2014	2.1	Meeting with SS to dicuss discrepancies in statutes of limitations; draft memo detailing various state statutes of limitations for fraud.	KLL	\$265	\$557
8/7/2014	0.1	Reviewed email exchange to PM re: various concerns.	JLN	\$570	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/7/2014	3.1	Discuss with JGb and PGM re: notice plan; discuss with PGM re: correspondance with notice company; review email exchange re: same; research re: limited funds class actions and discuss same with PGM and CT; discuss potential conflict of itnerests with CT and PGM.	SS	\$340	\$1,054
8/7/2014	2.7	Research re: limited funds class actions; meeting with SS to discuss research findings.	KLL	\$265	\$716
8/7/2014	0.3	Edit memo on conflict of interest.	CT	\$265	\$80
8/7/2014	4.2	Discuss class notice plan with SS and issues remaining to be addressed; discuss research on representation of multiple classes; correspond with class members; correspond with class administrator firm; edit mediation statement; edit motion in limine.	PGM	\$265	\$1,113
8/8/2014	0.7	Review discovery production for purposes of editing confidential mediation statement.	SS	\$340	\$238
8/8/2014	1.6	Update class member database; correspond with potential class members; correspond with class administrator; edit mediation statement; complete weekly review, update, and organization of case files.	PGM	\$265	\$424
8/8/2014	0.2	Touch base with case team re range of issues.	JGB	\$690	\$138
8/9/2014	1.2	Review notice emails; prep for upcoming conference.	JGB	\$690	\$828
8/10/2014	0.1	Email case team re case status and next steps.	JGB	\$690	\$69
8/11/2014	0.2	Line edit letter to the Court.	MMH	\$265	\$53
8/11/2014	1.3	Discuss class notice and upcoming conference with case team; review and edit letter and other materials to submit to Court.	JGB	\$690	\$897

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/11/2014	3.7	Review documents produced by opposing counsel re: number of class members; follow up email exchange with opposing counsel re: same; edit letter to court and review exhibits; discuss with KLL re: statute of limitations chart; research same and edit entries; discuss same with PGM; case meeting re: upcoming conference and follow up with opposing counsel; email to opposing counsel re: joint letter to court re: class notice and distribution of same.	SS	\$340	\$1,258
8/11/2014	2.7	Read and sort emails; update and edit statute of limitations memo.	KLL	\$265	\$716
8/11/2014	6.6	Research limited fund class actions; draft letter regarding class notice plan; edit letter regarding class notice plan; discuss export of billing records with MJN; edit language to opposing counsel regarding class notice issues and updated disclosures; meet with case team to discuss notice plan, discovery issues, and next steps.	PGM	\$265	\$1,749
8/12/2014	1.2	Review class notice plan letter and attachments; correspond with case team regarding filing of same; prepare for conference.	JGB	\$690	\$828
8/12/2014	0.3	Reviewed email exchange to PGM and SS re: letter to court; reviewed letter from JB to Court re proposed class notice plan.	JLN	\$570	\$171
8/12/2014	2.7	Edit letter to court re: notice plan; email exchange with opposing counsel re: same; edit table of statutes of limitations and discuss same with opposing counsel; review email exchange with notice experts and review declaration in support of notice plan; discuss with PGM re: correspondance with potential class members; review filing of letter with court.	SS	\$340	\$918
8/12/2014	0.1	Meet with PGM regarding next steps: letter to court regarding distribution claim; amended 26(a)s; responses to questions by class members.	KK	\$385	\$39

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/12/2014	5.7	Sort, save, and code documents into firm's practice management and documents database; review motion in limine edits; discuss argument memo with SS; draft argument memo; update statute of limitations memo; prepare documents for court appearance; correspond with vendor regarding declaration.	PGM	\$265	\$1,511
8/13/2014	2.3	Prepare for court conference; attend court conference and discuss case schedule, class notice plan, trial, and settlement.	JGB	\$690	\$1,587
8/13/2014	1.3	Reviewed minute entry of status conference held on 8-13-14; attended court conference re: class notice issue.	JLN	\$570	\$741
8/13/2014	4.2	Prepare for conference re: class notice; review relevant documents and correspondence; attend conference with case team and discuss class notice and scheduling plan; follow up discussion with case team re: same.	SS	\$340	\$1,428
8/13/2014	4.7	Prepare documents for court conference; update sum doc; correspond with class members; discuss technical issues of billing records import with MJN; attend court appearance regarding class notice.	PGM	\$265	\$1,246
8/13/2014	0.5	Update firm calendars with class notice schedule and trial dates.	KMB	\$265	\$133
8/14/2014	5.3	Discuss plan and tasks distribution with PGM; discuss with PGM re: communication with various potential class members; review other class action suits involving defendant; edit confidential mediation statement and amended letter to court; discuss with PGM re: correspondence with notice experts; continue discovery review and newly produced information from defendants re: computation of damages and number of class members.	SS	\$340	\$1,802

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/14/2014	0.5	Email to and from adversary re: scheduling and related issues; email correspondence with clients.	JGB	\$690	\$345
8/14/2014	2.6	Sort, save, and code documents into firm's practice management and documents database; correspond with class members; discuss edits to class notice and plan with SS; edit notice and plan.	PGM	\$265	\$689
8/15/2014	0.3	Correspond with case team regarding billing records import and call prep.	JGB	\$690	\$207
8/15/2014	0.4	Update court file binder.	KLL	\$265	\$106
8/15/2014	1.4	Reviewed draft mediation statement; email exchange to PGM and SS re: analysis of draft mediation statement.	JLN	\$570	\$798
8/15/2014	3.8	Edit mediation statement and updated letter to court; email exchange with notice experts re: call conference and scheduling call; review updated notice; discuss summary document with PGM; discuss potential directed verdict brief on behalf of New York Class with PGM; discuss with PGM re: 26(a) disclosures and motion in limine; discuss with PGM re: hours consolidation.	SS	\$340	\$1,292
8/15/2014	3.6	Sort, save, and code documents into firm's practice management and documents database; update calendars; discuss conference and tasks with SS; draft update to class administrator; correspond with potential class members; calculate damages; edit mediation statement; edit motion in limine; complete weekly update, review, and organization of case files.	PGM	\$265	\$954
8/17/2014	0.2	Review and give thoughts on weekly plan memo.	JGB	\$690	\$138
8/18/2014	0.3	Review proposed order and notice plan; review other proposed notice plans.	JGB	\$690	\$207
8/18/2014	0.2	Reviewed email to JGB re: draft mediation statement and letter.	JLN	\$570	\$114

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/18/2014	4.2	Review email exchange with JLN re: mediation statement and edit same; discuss same with JGB and PGM; research re: corporate veil piercing; review various discovery for purpose of determining class size; review edits to class notice content.	SS	\$340	\$1,428
8/18/2014	1.1	Review case status and next steps; discuss 26(a) update with SS and review case history regarding same.	PGM	\$265	\$292
8/19/2014	0.8	Review papers for Friday filing; review mediation statement; correspond with clients.	JGB	\$690	\$552
8/19/2014	3.7	Conference call with notice experts re: amended declaration and general distribution plan; discuss same with PGM; email exchange with notice experts re: media plan and discuss same with JGB; edit letter to court re: amended notice plan; review notice plan and discuss with PGM re: sending same to opposing counsel; edit confidential mediation statement.	SS	\$340	\$1,258
8/19/2014	1.6	Prepare for phone conference with claims administrator; attend phone call; edit notice and send to opposing counsel.	PGM	\$265	\$424
8/20/2014	0.7	Correspond with case team regarding mediation statement content and court follow up.	JGB	\$690	\$483
8/20/2014	0.3	Reviewed email exchange to PGM and JGB re: current billing rates for Iodestar.	JLN	\$570	\$171

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/20/2014	4.6	Research re: piercing of corporate veil; review discovery and discuss same with PGM re: damages to include in confidential mediation letter; review Judge Stein's pretrial practices; edit letter to court re: notice distribution; discuss declaration in support of same with JGB and PGM and follow up with notice experts re: same; review website's current content; discuss with PGM re: same and correspondence with potential class members; email exchange with JLN and JGB re: JLN's current rate; research re: same.	SS	\$340	\$1,564
8/20/2014	2.4	Discuss edits to mediation statement with SS; enter phone note; correspond with opposing counsel; correspond with potential class members; edit mediation statement.	PGM	\$265	\$636
8/21/2014	0.3	Correspond with case team and opposing counsel regarding class notice plan.	JGB	\$690	\$207
8/21/2014	1.1	Correspond with case team and opposing counsel regarding class notice plan; review proposed filings; follow up with adversary and co-counsel.	JGB	\$690	\$759
8/21/2014	0.2	Reviewed email exchange to PGM and JGB re: class notice letter.	JLN	\$570	\$114
8/21/2014	2.7	Review amended class notice and letter to court; edit same and review correspondence with opposing counsel re: same; edit mediation statement and discuss with PGM re: seeking permission to file additional pages; review statutes of limitations to be submitted to court; discuss with PGM re: correspondence with class members; email exchange with notice experts and edit declaration in support of notice distribution letter to court; discuss email and toll free number with notice experts.	SS	\$340	\$918
8/21/2014	0.2	Line edit letter to the court.	MMH	\$265	\$53
8/21/2014	3.4	Discuss mediation statement edits with SS; edit letter regarding class plan and assemble exhibits.	PGM	\$265	\$901

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/22/2014	3.9	Update letter regarding class plan; file letter; contact court regarding filing procedure; edit mediation statement and send to case team; review damages; review financial statements; complete weekly update, review, and organization of case files.	PGM	\$265	\$1,034
8/22/2014	1.1	Correspond with case team regarding financials; discuss mediation statement, financial statements, and possible next steps with case team; correspond with class representative regarding scheduling meeting; email and discuss with SS thoughts on next week's plan.	JGB	\$690	\$759
8/22/2014	1.8	Proof read letter to court; update court binder; research re: for attorneys' eyes documents.	KMB	\$265	\$477
8/22/2014	0.2	Reviewed letter from JGB to Court re: class notice plan and Order of the Court granting proposed class notice.	JLN	\$570	\$114
8/22/2014	3.8	Edit confidential mediation statement; review prior disclosures for purpose of editing motion in limine; email correspondance with opposing counsel re: financial statements and settlement conference; review financial statements and discuss same with PGM and JGB.	SS	\$340	\$1,292
8/23/2014	6.8	Legal research re: Rule 20 Motion and starting new related action against Riverside; prepared summary analyzing Rule 20 options, with case sites and quotes; reviewed latest IJL financial disclosures prepared; prepared analysis summarizing same.	JLN	\$570	\$3,876
8/24/2014	0.9	Reviewed email exchange re: IJL Financials and important strategic decisions re: Riverside.	JLN	\$570	\$513
8/25/2014	0.2	Reviewed email exchange regarding date of call.	JLN	\$570	\$114
8/25/2014	0.3	Review email exchange and analysis of defendants' financial statements.	SS	\$375	\$113

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/26/2014	0.2	Reviewed email exchange to JGB re: IJL/Riverside's thoughts in anticipation of court call.	JLN	\$570	\$114
8/26/2014	0.6	Email exchange with case team in preparation for settlement conference; participate in settlement conference; follow up discuss with JGB and JN re: same.	SS	\$375	\$225
8/26/2014	0.2	Sort, save, and code documents into firm's practice management and documents database; correspond with case team regarding equity company.	PGM	\$265	\$53
8/26/2014	1.1	Review and give thoughts on weekly plan memo; call with adversary re scheduling and settlement; discuss settlement and mediation issues with case team; review IJL financial documents.	JGB	\$690	\$759
8/28/2014	0.5	Discuss with partner status of case	JGB	\$690	\$345
9/1/2014	0.2	Review status memorandum and lay out plan for next steps	JGB	\$690	\$138
9/2/2014	1.3	Correspond with class representative regarding scheduling in-person meeting; correspond with case team regarding call with opposing counsel; review documents prior to settlement call.	JGB	\$690	\$897
9/2/2014	0.6	Reviewed email to and from NB enclosing supplemental response to 3rd demand for documents; reviewed email from PM re: media plan; reviewed email to JB re: Riverside's involvement with IJL; reviewed email from PM enclosing mediation plan letter to the Court.	JLN	\$570	\$342
9/2/2014	3.7	Review PGM's damages calculations; review email exchange between JGB adn JLN re: Riverside's involvement; research re: piercing of corporate veil and discuss same with PGM; review email to opposing counsel re: same; edit letter to court re: media plan.	SS	\$375	\$1,388

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/2/2014	3.9	Draft monthly update; correspond with potential class members; draft letter to court regarding media plan; research private equity liability.	PGM	\$295	\$1,151
9/3/2014	2.8	Correspond with case team regarding settlement; attend conference call with opposing counsel and co-counsel regarding settlement; edit update to class representatives; meeting with lead representative.	JGB	\$690	\$1,932
9/3/2014	0.9	Reviewed letter addressed to Judge from JGB re: proposed media plan; reviewed email from PGM re: settlement update; reviewed Melissa Brown Testimony for Riverside dominion/control of IJL.	JLN	\$570	\$513
9/3/2014	2.9	Edit mediation statement and discuss same with PGM; edit letter to court re: media notice and email exchange with opposing counsel re: same; supervise final edits and filing of letter to court re: media plan; edit email language to class counsel; discuss with PGM re: piercing corporate veil.	SS	\$375	\$1,088
9/3/2014	6.2	Send media plan letter to opposing counsel for review; edit and file media plan letter; review mediation statement for outstanding issues; attend conference call with opposing counsel; edit motion in limine; draft and send update to class reps; save, sort, and code documents into firm's electronic management system; conduct research for mediation statement and piercing the veil theories.	PGM	\$295	\$1,829
9/4/2014	2.6	Correspond with case team regarding mediation statement; review and edit mediation statement; review authority on piercing veil and other theories of judgment enforcement; email exchange with client re: next steps	JGB	\$690	\$1,794
9/4/2014	0.1	Reviewed email from PGM re: draft mediation statement.	JLN	\$570	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/4/2014	6.3	Review mediation statement edits and make changes; excerpt relevant portions of MTD; calculate damages numbers; research general business law damages; discuss mediation statement and outstanding issues including calculation of class size and damages with case team.	PGM	\$295	\$1,859
9/4/2014	4.4	Edit mediation statement and prepare for call with court; discuss with PGM re: correspondance with potential class members; continue research re: getting Riverside involved in lawsuit.	SS	\$375	\$1,650
9/5/2014	3.8	Attend teleconference with the Court and opposing counsel; discuss calculation of damages with case team; prep for conference; review emails; meet with client in anticipation of mediation.	JGB	\$690	\$2,622
9/5/2014	1.3	Teleconference with Magistrate Judge Netburn; Meeting with JB, SS & PM re: mediation letter; reviewed minute entry for telephone conference held 9/5/14; reviewed email from PGM enclosing mediation statement; reviewed email from JGB re: settlement update; reviewed email from JGB re: settlement update clarification; reviewed email from JB re: call to Court.	JLN	\$570	\$741
9/5/2014	1.7	Prepare for call with court re: settlement and participate in same; call to opposing counsel re: same; discuss same with case team and edit mediation statement per that discussion.	SS	\$375	\$638
9/5/2014	5.7	Complete weekly update, review, and organization of case files; discuss billing rates calculations with MJN; assemble list of staff for updates to billing rates; corrspnd with class representatives regarding settlement; correspond with case team regarding same; attend conference call with Court and discuss same with case team.	PGM	\$295	\$1,682
9/7/2014	1.9	Prepared analysis of revised mediation statement; sent email sumarizing same.	JLN	\$570	\$1,083

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/7/2014	0.1	Email to case team re: list of tasks to complete in following week.	SS	\$375	\$38
9/7/2014	0.2	Review and give thoughts on plan memorandum.	JGB	\$690	\$138
9/8/2014	1.1	Correspond with class representatives; discuss with outside counsel; review mediation statement; prepare for meeting and mediation.	JGB	\$690	\$759
9/8/2014	0.3	Reviewed email from PGM re: calculations of class action size; reviewed email from JGB enclosing Tortora's questions and concerns; received and reviewed letter from JGB to Judge re: overview of case and settlement options.	JLN	\$570	\$171
9/8/2014	3.4	Prepare for mediation; edit and draft mediation statement and discuss same with PGM; discuss with PGM re: correspondence with potential class members.	SS	\$375	\$1,275
9/8/2014	7.4	Review outstanding case tasks; update mediation letter incorporating JLN edits; troubleshoot mailing list; adjust calculations of class size and damages based on analysis of statutes of limitations; research liability of equity firm.	PGM	\$295	\$2,183
9/9/2014	3.2	Meet with case team to discuss settlement and evaluation of damages and evidence; review and edit mediation statement; prepare for mediation; meet with IJL client; email exchange with clients.	JGB	\$690	\$2,208
9/9/2014	0.1	Meet with PGM regarding next steps: meeting regarding mediation; drafting mediation statement; researching equity holder liability.	KK	\$410	\$41
9/9/2014	0.1	Reviewed email from JGB enclosing class representative's questions and concerns.	JLN	\$570	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/9/2014	4.7	Meet with case team to discuss how to proceed with settlement and trial; review JGB's edits to mediation statement and discuss same with PGM; research re: filing motion pursuant to rule 20 and piercing corporate veil; discuss with PGM re: drafting memo re: same.	SS	\$375	\$1,763
9/9/2014	5.6	Discuss status of settlement with case team; discuss outstanding research tasks, trial preparation, and evaluation of damages with case team; research and draft liability memo.	PGM	\$295	\$1,652
9/10/2014	1.1	Correspond with case team regarding conference call with class representatives; review and edit mediation memo; review IJL financials.	JGB	\$690	\$759
9/10/2014	0.7	Reviewed email from PGM re: information for 9-11 call; reviewed email from PGM re: update reviewed email from Shapiro enclosing state-by-state pricing and statutes of limitations; received and reviewed letter from JGB to Judge re: overview of case and settlement options.	JLN	\$570	\$399
9/10/2014	5.3	Prepare for mediation and call with class representatives; review JGB's email to class representatives re: answers to questions; discuss with PGM re: correspondance with potential class members; research re: Riverside's liability under various modes of enforcement; review of documents previously produced by Riverside and other discovery re: same.	SS	\$375	\$1,988
9/10/2014	6.5	Correspond with class representatives regarding phone conference; correspond with class members; edit mediation statement incorporating JGB comments; research and draft memo on equity liability.	PGM	\$295	\$1,918

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/11/2014	2.8	Discuss billing rates with analyst; lead conference call with class representatives; correspond with case team and opposing counsel regarding mediation and updated class information; meet with co-counsel to discuss case status and strategy for settlement and trial; discuss with partner settlement possibilities	JGB	\$690	\$1,932
9/11/2014	0.2	Line edit draft response to opposing counsel.	MMH	\$295	\$59
9/11/2014	0.2	Reviewed email from PGM re: draft mediation statement; reviewed email from JGB re: settlement purposes.	JLN	\$570	\$114
9/11/2014	6.8	Call with class representatives re: mediation and general settlement strategy; review newly received information from defendant; edit mediation statement with new information and per JGB's and JLN's edits and comments; continue to research re: Riverside's liability through various modes of enforcement.	SS	\$375	\$2,550
9/11/2014	8.2	Analyze defendants' numbers concerning class size and damages; discuss defendants' numbers and information with SS; set up conference call line and call vendor regarding same; attend conference call with class representatives; edit mediation statement; draft response to opposing counsel regarding defendants' calculations of class size and damages.	PGM	\$295	\$2,419
9/12/2014	9.1	Draft joint letter regarding calculation of class size and damages; correspond with opposing counsel regarding same; correspond with class reps regarding mediation; draft correspondence to potential class members; file mediation statement and joint letter; file electronic discovery request; research messaging systems for court; correspond with court regarding electronic discovery request; update calculations of class size and damages; discuss same with SS.	PGM	\$295	\$2,685

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/12/2014	2.8	Correspond with case team regarding mediation statement, joint letter, and settlement issues; correspond with opposing counsel and attend conference call regarding settlement; edit mediation statement and joint letter.	JGB	\$690	\$1,932
9/12/2014	0.1	Print exhibits for mediation statement.	KMB	\$295	\$30
9/12/2014	0.7	Edit mediation statement; discuss same with SS.	JLM	\$460	\$322
9/12/2014	0.5	Deliver mediation statement to the court.	MMH	\$295	\$148
9/12/2014	0.6	Reviewed email from PGM re: joint letter draft; reviewed email from PGM re: mediation dial in information; reviewed order allowing electronic device for proceeding and/or trial; reviewed numerous emails from PGM modifying settlement letter and attaching spreadsheet.	JLN	\$570	\$342
9/12/2014	7.1	Edit and draft mediation statement to include most updated information and JGB's edits; phone conference with opposing counsel re: settlement; draft joint letter to court re: number of class members and damages; email exchange with opposing counsel re: discrepancies in numbers and discuss same with JGB and PGM; review electronic devices request and discuss with PGM re: same; discuss with PGM re: texting system for mediation; review call-in information for mediation.	SS	\$375	\$2,663
9/13/2014	0.9	Telephone conference with clients re: updates; telephone conference with JGB re: settlement discussions and next steps for moving forward.	JLN	\$570	\$513
9/13/2014	2.2	Review mediation memo; review earlier correspondence; review financial information; discuss settlement with partner; general mediation preparation	JGB	\$690	\$1,518
9/14/2014	3.2	Reviewed case file, prior motions and orders, mediation statement for preparation of mediation on for 9/15/14.	JLN	\$570	\$1,824

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/14/2014	1.2	Prepare for mediation; follow up with case team.	JGB	\$690	\$828
9/15/2014	6.3	Review case documents and discuss settlement strategy with case team in preparation for mediation; attend mediation.	JGB	\$690	\$4,347
9/15/2014	5.7	Meeting with Lisa Bruno and Brad Berkowitz in preparation of mediation; attended mediation before Magistrate Judge Netburn; reviewed email re: conference call; reviewed minute entry for settlement conference held on 9/15/14.	JLN	\$570	\$3,249
9/15/2014	9.4	Prepare for mediation by reviewing relevant documents submitted to court; meet with JGB re: same; discuss with clients re: what to expect; test texting application required to reach out to clients during mediation; participate in mediation and discuss same with case team and clients; discuss with case team re: next steps and how to proceed in light of mediation.	SS	\$375	\$3,525
9/15/2014	6.7	Discuss preparation for mediation including calculation of damages; attend mediation; correspond with class representatives; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$1,977
9/16/2014	2.8	Follow up emails with clients; discuss settlement and next steps with clients and case team; review previous settlements; review defendant financials and class cert order.	JGB	\$690	\$1,932
9/16/2014	0.3	Reviewed email exchange to all parties re: settlement (Post Mediation Emails).	JLN	\$570	\$171
9/16/2014	1	Correspond with potential class members; discuss statute regarding attorneys fees and voucher settlement with SS.	PGM	\$295	\$295

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/16/2014	6.8	Discuss with PGM and JGB re: tasks to complete going forward; discuss with JGB re: follow up with notice experts; research and draft memo re: in kind settlements and effect on attorneys' fees; discuss same with PGM; discuss with PGM re: correspondence with potential class members; review correspondence with class representatives re: update on status of settlement.	SS	\$375	\$2,550
9/17/2014	1.8	Correspond with opposing counsel regarding settlement; discuss voucher settlement issues with case team; emails to and from case team.	JGB	\$690	\$1,242
9/17/2014	0.2	Reviewed email exchange re: Riverside and settlement (Post Mediation Emails).	JLN	\$570	\$114
9/17/2014	6.2	Research re: settlement provision of CAFA; discuss same with PGM; review and edit memo re: same; discuss same with JGB; discuss with PGM re: correspondence with potential class members and edit same; review email exchange with opposing counsel re: settlement and extensions and discuss same with JGB.	SS	\$375	\$2,325
9/17/2014	5.9	Review client correspondence regarding settlement; research 28 U.S.C. 1712 and fees in voucher settlement; draft memo regarding same; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$1,741
9/18/2014	2.4	Review memo regarding 28 U.S.C. 1712 and settlements; correspond with case team regarding further settlement research; review letter to court by adversary; discuss settlement and next step issues with partner	JGB	\$690	\$1,656
9/18/2014	0.1	Reviewed order of the court granting defendant extension of deadline to accept settlement proposal.	JLN	\$570	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/18/2014	6.4	Continue research re: settlement implications; discuss with PGM re: correspondance with class members; edit memo re: voucher settlements; discuss same with PGM and JGB; research same.	SS	\$375	\$2,400
9/18/2014	3.3	Research voucher settlements; draft memorandum regarding same; save, sort, and code documents into firm's electronic managment system; correspond with class member.	PGM	\$295	\$974
9/19/2014	1.1	Review and give thoughts on memo on settlement issues.	JGB	\$690	\$759
9/19/2014	4.5	Discuss with JGB and PGM re: voucher settlement cases; research re: same; edit memo re: same and discuss edits with PGM; discuss with PGM re: communication with potential class members; review letter sent to IJL by a third party re: poor service.	SS	\$375	\$1,688
9/19/2014	5.1	Research voucher settlements; draft memo regarding same; correspond with class members; complete weekly review, update, and organization of case files.	PGM	\$295	\$1,505
9/20/2014	0.1	Draft and send email to case team re: tasks to be completed in upcoming days.	SS	\$375	\$38
9/21/2014	0.9	Review and give thoughts on plan memorandum; review memo re: settlement issues.	JGB	\$690	\$621
9/22/2014	1.3	Correspond with case team regarding settlement research; review authority on settlements.	JGB	\$690	\$897
9/22/2014	3	Research voucher settlement; review newspaper article referenced by class representative; discuss settlement structure with SS.	PGM	\$295	\$885

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/22/2014	6.2	Continue research re: voucher and injunction settlement; discuss same with PGM; edit memo re: same; review JGB's email re: same and discuss same with PGM; email exchange with JGB re: update to class representatives; discuss with PGM re: very recent decision about attorneys' fees in voucher settlement; discuss with PGM re: correspondance with various potential class members; review re: action involving alleged violation of same state statute by a different dating agency.	SS	\$375	\$2,325
9/23/2014	1.4	Correspond with class representatives regarding update on status of settlement; review media piece; review Courts of Appeal authority on settlements.	JGB	\$690	\$966
9/23/2014	0.1	Meet with PGM regarding next steps: draft of memorandum regarding settlement.	KK	\$410	\$41
9/23/2014	4.5	Research voucher settlements and draft memo regarding same; correspond with class representatives.	PGM	\$295	\$1,328
9/23/2014	4.8	Review recent decision re: voucher settlements and discuss same with PGM and JGB; continue research re: various outcomes in cases with combined voucher and injunctions and cash settlements; discuss same with PGM; discuss with PGM re: correspondance with potential class members; draft language to send to clients re: update on settlement timeline and Riverside's insurance carrier.	SS	\$375	\$1,800
9/24/2014	2.7	Draft memo regarding voucher settlement research; draft plan for outstanding case plan; call claims administrator regarding status of notice plan.	PGM	\$295	\$797

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/24/2014	1.8	Review edited memo re: voucher settlement and discuss same with PGM; research re: same; discuss call to outside notice company with PGM; draft and send email to case team re: plan of upcoming tasks; review JGB's edits to memo on voucher settlements.	SS	\$375	\$675
9/25/2014	0.3	Review memo regarding settlement and 28 U.S.C 1712; review email correspondence with case team regarding same.	SS	\$375	\$113
9/25/2014	1.8	Review comments on memo and send to JLN; research case law on voucher settlements and valuation; correspond with case team regarding same.	PGM	\$295	\$531
9/25/2014	0.8	Review and give thoughts on memo; review relevant authority re voucher settlements.	JGB	\$690	\$552
9/26/2014	0.2	Review case team emails regarding settlement and fees research; review opposing counsel's request for more time to respond to recommended settlement.	SS	\$375	\$75
9/26/2014	1.2	Discuss settlement research with analyst and review co-counsel's comments regarding same; review and give thoughts on memo; email exchange with defense counsel re request for more time.	JGB	\$690	\$828
9/26/2014	1.4	E-mail PGM summarizing case law from Judge Stein on multipliers and percentage of common fund; conduct legal research re: Judge Stein's holdings in common fund cases; Review memo prepared by PGM re: vouchers and multipliers & percentage of common funds.	JLN	\$570	\$798
9/26/2014	3.7	Complete weekly update, organization, and review of case files; review records of expenses; correspond with MJN regarding same; correspond with potential class member; draft memo regarding fees application.	PGM	\$295	\$1,092
9/28/2014	0.2	Review and give thoughts on plan memorandum	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/29/2014	0.4	Correspond with analyst regarding receipt of co-counsel's billing entries; email analyst re follow up to clients; review court order	JGB	\$690	\$276
9/29/2014	0.3	Correspond with co-counsel regarding billing entries; correspond with MJN regarding import of billing entries into firm's electronic management system.	PGM	\$295	\$89
9/29/2014	0.2	Review order re: additional time to respond to settlement request and follow up email exchange.	SS	\$375	\$75
9/30/2014	3	Update class representatives on status of settlement; correspond with potential class members; update billing entries; update expense records and review case files for same.	PGM	\$295	\$885
9/30/2014	0.2	Review recent orders and filings	JGB	\$690	\$138
9/30/2014	0.1	Meet with PGM regarding next steps: attorneys' fees memorandum.	KK	\$410	\$41
10/1/2014	0.1	Touch base with analyst re settlement issues	JGB	\$690	\$69
10/1/2014	1.5	Edit billing entries to conform with firm standards; draft update to class members on status of the action; draft memorandum regarding fees and research authority regarding same.	PGM	\$295	\$443
10/2/2014	3.9	Correspond with class representatives and case team regarding settlement; correspond with court regarding settlement offer and discuss same with PGM; discuss settlement with partner and outside colleagues; work on settlement plan	JGB	\$690	\$2,691
10/2/2014	0.9	Document call to court regarding settlement; email class representatives regarding settlement.	PGM	\$295	\$266

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/3/2014	3.6	Correspond with opposing counsel, case team, and court regarding settlement discussions, court conference, and recent related New Jersey class action; correspond with case team regarding preparation for court conference; review papers from related action; review and update memo on settlement and give directions to case team; email exchange with clients regarding next steps.	JGB	\$690	\$2,484
10/3/2014	0.4	Review email exchange with opposing counsel re: call and consent to assign case to magistrate for all purposes; review email exchange with class representatives re: status of settlement; review email exchange with Court re: conference date.	SS	\$375	\$150
10/3/2014	0.8	Complete weekly review, update, and organization of case files; draft motion for electronic device use; review correspondence regarding settlement and update calendar accordingly; save, sort, and code documents into firm's electronic management system; contact court regarding electronic device request.	PGM	\$295	\$236
10/6/2014	2.1	Discuss range of settlement issues with two outside counsel; discuss with SS next steps including notice issues.	JGB	\$690	\$1,449
10/6/2014	3.3	Meet with PGM re: various research topics related to settlement; discuss same with JGB; discuss with JGB re: transferability of vouchers; draft email to case team re: plan; research re: transferability of vouchers in class action settlements; discuss with PGM re: correspondence with potential class members; discuss with PGM re: call to notice expert.	SS	\$375	\$1,238
10/6/2014	1.6	Discuss research topics with SS, including fairness hearing procedure and settlement proposal; respond to potential class members.	PGM	\$295	\$472
10/7/2014	0.1	Correspond with analyst regarding court order.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/7/2014	1.6	Discuss case status and topics for research with SS; document conference call; draft case work schedule and tasks plan; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$472
10/7/2014	4.7	Meet with PGM re: research tasks and amending plan email; review various decisions re: proposed settlements and objections thereto; call to notice administrators re: status of notice and discuss same with PGM.	SS	\$375	\$1,763
10/8/2014	2.7	Research re: service fees and deduction of administrative fees from common fund; review decision re: same; email exchange with claim administrator re: sample notice.	SS	\$375	\$1,013
10/8/2014	0.8	Discuss with case team next steps; email co-counsel; review authority on injunctive relief.	JGB	\$690	\$552
10/8/2014	1.4	Review attorneys' fees application; schedule audio call and circulate information; correspond with potential class members.	PGM	\$295	\$413
10/9/2014	1.4	Review settlement stip outline; prepare for call with defense counsel; discuss matter with outside colleague	JGB	\$690	\$966
10/9/2014	2.9	Discuss with PGM re: correspondence with potential class members; research re: interest on settlement fund; review correspondence with claim administrator re: same; research re: settlement procedure in general and discuss same with PGM.	SS	\$375	\$1,088
10/9/2014	3.2	Research class action settlement standards; review expenses; discuss research with SS.	PGM	\$295	\$944
10/10/2014	2.5	Meet with case team in preparation for settlement discussion with opposing counsel; discuss settlement issues with opposing counsel in advance of court conference; prepare for upcoming settlement conference.	JGB	\$690	\$1,725

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/10/2014	2.9	Meet with case team re: topics to discuss during call with opposing counsel; call with opposing counsel; review case summary memorandum to ensure it is up to date; research re: other pending cases against same defendant.	SS	\$375	\$1,088
10/10/2014	1.4	Meeting with JGB, SS & PGM re: multiple issues on vouchers, transferability, CAFA and upcoming conference with Judge Stein; telephone conference with defense counsel and JGB, SS, PGM re: multiple issues on moving forward and upholding settlement; follow-up telephone conference with JGB and case team re: conference call.	JLN	\$570	\$798
10/10/2014	2.7	Complete weekly update, review, and organization of case files; meet to discuss topics to raise during call with opposing counsel; document settlement call; update Dropbox with case files in preparation for hearing.	PGM	\$295	\$797
10/11/2014	0.1	Email exchange with SS re: upcoming work plan.	JGB	\$690	\$69
10/11/2014	0.1	Send email to case team re: updated plan and tasks to complete in near future.	SS	\$375	\$38
10/12/2014	0.3	Review and give thoughts on plan memorandum; prepare for status conference; email case team re: prep.	JGB	\$690	\$207
10/14/2014	1.6	Attend status conference and discuss next steps in the settlement process with case team, including drafting of settlement agreement; follow up with outside counsel.	JGB	\$690	\$1,104
10/14/2014	4.4	Prepare for court conference and attend same with JGB and PGM; discuss outcome with JGB and plan timeline for settlement agreement and general schedule; review sample settlement agreement and discuss with PGM re: drafting preliminary schedule; discuss with JGB re: correspondence with claim administrator.	SS	\$375	\$1,650

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/14/2014	2.9	Check scheduling conflicts in advance of conference; discuss communication with potential class members; draft update to clients; update calendar; attend court conference.	PGM	\$295	\$856
10/15/2014	2.9	Correspond with analyst concerning message from potential class member; review and give thoughts on settlement stip; discuss next steps with case team.	JGB	\$690	\$2,001
10/15/2014	6.7	Edit and draft settlement agreement; review other settlement agreements and discuss same with JGB and PGM; email exchange with claim administrator re: same; discuss timeline with JGB; discuss scheduling of notice and settlement dates with PGM and review Judge Stein's previous scheduling orders; email exchange with MJN re: notice to class members; email draft of settlement agreement to JGB and discuss next draft and edits with him.	SS	\$375	\$2,513
10/15/2014	3.9	Update calendar; draft settlement agreement; correspond with class members.	PGM	\$295	\$1,151
10/15/2014	0.1	Meet with PGM to discuss next steps; draft settlement agreement.	KK	\$410	\$41
10/16/2014	1.7	Discuss drafting of settlement with SS; review draft of settlement; follow up with outside colleague re settlement thoughts.	JGB	\$690	\$1,173
10/16/2014	7.2	Edit and draft mediation statement; discuss with PGM re: potential class members' inquiry; review needed exhibits to settlement agreement; discuss timeline re: same with JGB; call and email exchange with claim administrator.	SS	\$375	\$2,700
10/16/2014	2.3	Review settlement agreement; correspond with class members; update billing entries; contact claims administrator.	PGM	\$295	\$679
10/17/2014	0.8	Review and edit settlement stipulation.	TJF	\$440	\$352

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/17/2014	4.4	Edit settlement agreement and send same to claim administrator; discuss same with JGB and PGM; conference call with claim administrators re: provisions of settlement agreement; edit agreement to include edits and additional provisions; send agreement to opposing counsel for review.	SS	\$375	\$1,650
10/17/2014	3	Complete weekly update, review, and organization of case files; edit settlement agreement and discuss with SS.	PGM	\$295	\$885
10/17/2014	1.2	Review draft settlement agreement; discuss with case team; correspond with administrator.	JGB	\$690	\$828
10/18/2014	1.3	Review and give thoughts on plan memorandum; review draft settlement agreement	JGB	\$690	\$897
10/19/2014	0.7	Review other settlement stips; review proposed settlement stip	JGB	\$690	\$483
10/20/2014	0.5	Meet with SS to discuss settlement exhibits; correspond with class members.	PGM	\$295	\$148
10/20/2014	0.1	Meet with PGM regarding next steps: settlement agreement and notice.	KK	\$410	\$41
10/20/2014	1.8	Meet with PGM re: exhibits to settlement agreement; discuss with PGM re: correspondence with potential class members; review prior settlement notices in cases presided over by Judge Stein; review previous scheduling orders; research re: whether to include proposed order as exhibit.	SS	\$375	\$675
10/20/2014	1.7	Review draft settlement stip and provide thoughts to case team.	JGB	\$690	\$1,173
10/21/2014	1.6	Correspond with case team concerning status of motion to dismiss; review further changes to stip; correspond with case team and adversary re settlement.	JGB	\$690	\$1,104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/21/2014	3.1	Email exchange with JGB re: edits to settlement agreement; case meeting re: same; discuss same with PGM; edit settlement agreement; email exchange with opposing counsel re: same.	SS	\$375	\$1,163
10/21/2014	3.2	Correspond with potential class members; edit settlement agreement; attend case meeting to discuss settlement status.	PGM	\$295	\$944
10/22/2014	1.3	Discuss with PGM re: various correspondence with potential class members; discuss with PGM re: billing entries and loadstar calculation; review same.	SS	\$375	\$488
10/22/2014	3.5	Correspond with class members; update class member database; review and assemble documentation of litigation costs; update staff billing information.	PGM	\$295	\$1,033
10/23/2014	1.1	Correspond with case team and opposing counsel concerning scheduling of teleconference; review potential exhibits to settlement stip.	JGB	\$690	\$759
10/23/2014	1.3	Email exchange with opposing counsel re: rescheduling phone call for following week; discuss correspondence with potential class members with PGM; review drafts of notice and claim form and discuss same with PGM.	SS	\$375	\$488
10/23/2014	2.8	Update billing entries; draft settlement notice and claims forms; assemble documentation of expenses.	PGM	\$295	\$826
10/24/2014	0.5	Discuss with PGM re: correspondence with class members; discuss with PGM re: expenses and attorneys' fees.	SS	\$375	\$188
10/24/2014	1.5	Complete weekly update, organization, and review of case documents; correspond with potential class members; assemble documentation of expenses.	PGM	\$295	\$443
10/26/2014	0.8	Review and give thoughts on plan memorandum; review draft settlement agreement	JGB	\$690	\$552

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/27/2014	6.2	Review opposing counsel's edits to settlement agreement; discuss edits with SS; assemble documentation of expenses; research and assemble fee award precedents for submission of authority to opposing counsel; draft proposed settlement schedule; correspond with potential class members.	PGM	\$295	\$1,829
10/27/2014	3.2	Review proposed settlement schedule; review edits to settlement agreement and discuss same with JGB and PGM; send email re: same to case team; call with opposing counsel re: same.	SS	\$375	\$1,200
10/27/2014	0.3	Telephone conversation with defense counsel re: settlement agreement terms; follow up conversation with JGB, PGM and SS re: same.	JLN	\$570	\$171
10/27/2014	1.7	Review drafts of settlement stip; teleconference with opposing counsel to discuss edits to settlement agreement and other settlement issues; discuss settlement terms and negotiation strategy with case team; review authority on attorney's fees	JGB	\$690	\$1,173
10/28/2014	1.4	Discuss proposed settlement schedule with case team; review previous Judge Stein schedules; review email on authority re: attorney's fees	JGB	\$690	\$966
10/28/2014	0.1	Meet with PGM regarding next steps: research issues regarding motion for attorneys' fees and recover for classes requesting injunctive relief.	KK	\$410	\$41
10/28/2014	2.4	Discuss with PGM re: correspondence with potential class members; review proposed settlement and fairness hearing schedule; email exchange with claim administrators re: same; discuss with PGM re: research on fee award in cases involving injunctive relief and monetary relief.	SS	\$375	\$900
10/28/2014	0.2	Line edit draft email to Shapiro.	MMH	\$295	\$59

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/28/2014	2.9	Research fee awards in mixed injunctive relief and cash settlements; draft email to Shapiro; update schedule of settlement and send to claims administrator; correspond with potential class members.	PGM	\$295	\$856
10/29/2014	0.8	Discuss settlement schedule and exhibits with SS; review exhibits.	JGB	\$690	\$552
10/29/2014	2.1	Conference call with claim administrators and discuss same with PGM; review proposed dates and edit same per call with claim administrators; email exchange with opposing counsel re: edits to settlement agreement, dates and exhibits to settlement agreement; discuss with PGM re: drafting and editing exhibits and review same.	SS	\$375	\$788
10/29/2014	0.1	Reviewed e-mail exchange between SS and defense counsel re: status of IJL's feedback on proposed settlement agreement	JLN	\$570	\$57
10/29/2014	4.3	Correspond with potential class members; edit and draft exhibits to settlement including long form notice.	PGM	\$295	\$1,269
10/30/2014	1.2	Review proposed version of stipulation from defendants; discuss with case team concerns and proposals	JGB	\$690	\$828
10/30/2014	3.7	Discuss with PGM re: drafts of notice and exhibits; review and edit same; review email exchange with opposing counsel re: same; review proposed edits to settlement agreement; discuss same with case team and draft language to send to opposing counsel re: same.	SS	\$375	\$1,388
10/30/2014	3.4	Draft long form notice; correspond with class members; correspond with opposing counsel regarding settlement documents.	PGM	\$295	\$1,003

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/31/2014	1.8	Complete organization, review, and update of case files; review edits to settlement agreement and next steps; save, sort, and code documents into firm's electronic document system; draft plan for next steps; produce fees report.	PGM	\$295	\$531
10/31/2014	2.4	Correspond with opposing counsel regarding terms of settlement; discuss terms of settlement and negotiation strategy with case team.	JGB	\$690	\$1,656
10/31/2014	2.7	Call with opposing counsel and meet with case team re: settlement terms; review proposed changes in settlement terms and draft email to opposing counsel re: all of our objections and counter proposals; review letter to court re: seeking adjournment of settlement proposal due date; discuss same with PGM.	SS	\$375	\$1,013
10/31/2014	1.2	Reviewed revised version of defense counsel re: changes to settlement agreement; took notes re: same; read multiple e-mail exchanges between JGB and defense counsel re: changes and issues in settlement agreement; meeting with JGB and rest of team for conference call with defense counsel; post call meeting with rest of team re: best way to resolve differences on settlement agreement; reviewed e-mail exchange between JGB and defense counsel re: transfer ability issue and writing to Court for extension of settlement agreement; reviewed defense counsels letter to Court seeking one week adjournment for settlement agreement.	JGB	\$690	\$828
11/2/2014	0.7	Review settlement papers; correspond with case team re: settlement	JGB	\$690	\$483
11/3/2014	1.4	Review and give thoughts on plan memorandum; email exchange with adversary; prep email with final points to adversary; conduct conference call with opposing counsel regarding settlement terms; correspond with opposing counsel concerning outstanding settlement issues; correspond with case team concerning extension order.	JGB	\$690	\$966

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/3/2014	0.1	Reviewed e-mail exchange between JGB re: check in plan.	JLN	\$570	\$57
11/3/2014	2.5	Draft monthly update to class members; correspond with potential class members; document phone call with opposing counsel.	PGM	\$295	\$738
11/3/2014	1.7	Discuss with PGM re: correspondence with potential class members ;call with opposing counsel re: terms of settlement; email exchange with opposing counsel re: call about settlement and separate call to Court re: adjournment; discuss same with PGM; review email exchange with opposing counsel re: other unresolved settlement terms.	SS	\$375	\$638
11/4/2014	0.9	Correspond with opposing counsel concerning settlement terms; discuss outstanding settlement issues with case team.	JGB	\$690	\$621
11/4/2014	0.1	Reviewed e-mail exchange between JGB re: follow up after call and remaining points.	JLN	\$570	\$57
11/4/2014	0.1	Meet with PGM regarding next steps: preparing settlement documents and drafting motion for attorneys' fees.	KK	\$410	\$41
11/4/2014	2.1	Draft response to opposing counsel concerning settlement issues; discuss settlement terms with case team; review settlement agreement.	PGM	\$295	\$620
11/4/2014	1.8	Email exchange with case team re: various terms of settlement and discuss same with PGM; analyze proposed settlement terms and draft counter proposal re: same; research re: CAFE coupon settlement requirements and email to opposing counsel re: same.	SS	\$375	\$675
11/5/2014	2.3	Correspond with case team concerning settlement terms and review opposing counsel's proposed terms; discuss settlement and related issues with claims administrator representative.	JGB	\$690	\$1,587

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/5/2014	0.1	Reviewed e-mail exchange between JGB re: proposed schedule and exhibits.	JLN	\$570	\$57
11/5/2014	1.4	Review most recent version of settlement agreement and discuss terms with PGM; discuss with PGM re: correspondance with opposing counsel and timeline; edit settlement agreement to incorporate updated terms.	SS	\$375	\$525
11/5/2014	1.6	Update billing records; correspond with opposing counsel requesting timeline on outstanding issues; update proposed settlement schedule; correspond with potential class members; review opposing counsel's proposed settlement terms and discuss with SS.	PGM	\$295	\$472
11/6/2014	1.4	Discuss edits to settlement with case team and review draft settlement; correspond with opposing counsel regarding same; edit settlement document and submit to adversary.	JGB	\$690	\$966
11/6/2014	0.1	Reviewed e-mail exchange between JGB re: call with opposing counsel.	JLN	\$570	\$57
11/6/2014	3.7	Edit settlement agreement; correspond with class members; discuss next steps with case team.	PGM	\$295	\$1,092
11/6/2014	1.8	Edit settlement agreement and discuss same with JGB; email correspondence with opposing counsel re: same; discuss with PGM and JGB re: exhibits and schedule and follow up with opposing counsel re: same.	SS	\$375	\$675
11/7/2014	1.3	Correspond with case team concerning status of settlement and terms; correspond with opposing counsel concerning same; review and give thoughts on plan memorandum.	JGB	\$690	\$897
11/7/2014	0.1	Reviewed e-mail exchange with JGB re: near final draft, thoughts on a few issues and schedule.	JLN	\$570	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/7/2014	3.7	Email exchange with opposing counsel re: edits to settlement agreement; phone call with opposing counsel re: that and new issues concerning franchisees' willingness to honor agreement; discuss same with JGB and PGM; discuss with PGM re: correspondence with potential class member; edit settlement agreement and notice; email exchange with claim administrators re: same and review edits provided by them; discuss timeline of various filings with claim administrators.	SS	\$375	\$1,388
11/7/2014	1.8	Complete weekly update, organization, and review of case files; review responses to monthly update to class members; correspond with opposing counsel concerning settlement schedule.	PGM	\$295	\$531
11/10/2014	0.1	Reviewed e-mail exchange between JGB and defense counsel re: follow up with the Court and two logistical issues.	JLN	\$570	\$57
11/10/2014	4	Discuss with PGM re: potential class member's correspondence; discuss with JGB re: following up with opposing counsel re: request for adjournment; review correspondence with claim administrators re: distribution and edits to settlement agreement; email exchange with opposing counsel re: same; review new draft of settlement agreement provided by opposing counsel and discuss same with JGB and PGM; edit and file notice of appearance.	SS	\$375	\$1,500
11/10/2014	2.3	Review comments from claims administrator; correspond with potential class members; draft email to opposing counsel; discuss settlement status with SS; draft and file notice of entry.	PGM	\$295	\$679
11/11/2014	1.1	Correspond with case team concerning settlement edits; review iterations of settlement draft.	JGB	\$690	\$759
11/11/2014	0.1	Meet with PGM regarding next steps: motion for attorneys' fees; edits to settlement agreement.	KK	\$410	\$41

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/11/2014	3.4	Review most recent draft of settlement agreement and discuss with PGM and JGB; draft email to opposing counsel re: same and discuss email with JGB; discuss with PGM re: correspondence with potential class members.	SS	\$375	\$1,275
11/11/2014	2.2	Discuss case status and tasks with KK; discuss edits to settlement with SS; review opposing counsel's settlement edits; save, sort, and code documents into firm's electronic management system; update documentation of expenses; draft motion for fees; correspond with class members.	PGM	\$295	\$649
11/12/2014	0.7	Email exchange with case team and adversary re: settlement; review most recent settlement agreement; follow up with case team.	JGB	\$690	\$483
11/12/2014	0.1	Reviewed e-mail exchange between JGB re: continued aspects of near final draft, thoughts on issues and scheduling.	JLN	\$570	\$57
11/12/2014	0.8	Discuss with PGM re: correspondence with potential class member; review email exchange with opposing counsel re: next draft of settlement agreement; discuss same with PGM; review Court's order granting extension; review draft of settlement agreement provided by opposing counsel and exchange emails with case team re: same.	SS	\$375	\$300
11/12/2014	1	Handle misdirected cash checking inquiry; correspond with opposing counsel concerning settlement draft; correspond with claims administrator; correspond with class members; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$295
11/13/2014	1.2	Correspond with case team concerning edits to amendments and review proposed settlement language; review proposed changes; review updated email from adversary.	JGB	\$690	\$828

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/13/2014	3.2	Discuss with PGM re: correspondence with potential class representatives; review most recent settlement agreement draft and long notice edits; email exchange with JGB re: same; discuss same with PGM and edit agreement; draft correspondence to opposing counsel.	SS	\$375	\$1,200
11/13/2014	3.2	Review draft settlement and discuss with SS; review status of New Jersey action; update billing information; conduct research for motion for fees; correspond with class members.	PGM	\$295	\$944
11/14/2014	0.1	Reviewed e-mail exchange between PGM re: redlined changes relative to Long & Short Form Notice.	JLN	\$570	\$57
11/14/2014	3.9	Complete weekly review, update, and organization of case files; discuss edits to settlement agreement with SS and review latest draft, adding comments and edits; edit class notice; draft update on case status to class representatives; correspond with opposing counsel concerning settlement documents; discuss next steps with SS.	PGM	\$295	\$1,151
11/14/2014	2.9	Email exchange with opposing counsel re: terms of settlement agreement; discuss same with JGB and PGM; follow up with opposing counsel re: same; review and edit short and long notice form and settlement agreement; discuss with PGM re: correspondence with potential class member; draft email language updating clients about status of negotiations, discuss same with SS, and email same to JGB; email case team re: upcoming deadlines.	SS	\$375	\$1,088
11/14/2014	1.3	Email exchanges with case team and adversary re settlement issues; draft language to clients; review and give thoughts on plan memorandum.	JGB	\$690	\$897
11/15/2014	0	Reviewed e-mail exchange between JGB re: review of class notice action.	JLN	\$570	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/15/2014	1.6	Correspondence with adversary and case team; review most recent settlement stip.	JGB	\$690	\$1,104
11/16/2014	0.1	Reviewed e-mail exchange between JGB & SS re: Class Notice Action.	JLN	\$570	\$57
11/16/2014	0.6	Exchange emails with adversaries and case team re: next steps and stip; review stip versions	JGB	\$690	\$414
11/17/2014	1.9	Correspond with case team and opposing counsel concerning status of settlement agreement and edits; review settlement drafts.	JGB	\$690	\$1,311
11/17/2014	0.1	Reviewed JGB e-mail to lead plaintiffs re: update on settlement issues.	JLN	\$570	\$57
11/17/2014	0.1	Discuss daily tasks with PGM.	JLM	\$460	\$46
11/17/2014	1.7	Phone calls with PGM and email exchange with JGB re: class notice amended content; review and discuss edits with PGM; discuss with PGM over phone re: version of notice to which opposing counsel made edits to.	SS	\$375	\$638
11/17/2014	4.6	Sort, save, and code documents into firm's practice management and documents database; review edits and correspondence from opposing counsel; send settlement documents to class representatives; discuss edits to class notice with SS; compare different versions of class notice and correspond with case team concerning same; correspond with class members; edit class notice.	PGM	\$295	\$1,357
11/18/2014	0.8	Begin application for attorneys' fees.	ANW	\$285	\$228
11/18/2014	2.2	Correspond with case team concerning settlement terms, status, and discussion with opposing counsel; review proposed new agreement and letter; discuss with case team.	JGB	\$690	\$1,518

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/18/2014	4.2	Edit all settlement papers including exhibits; discuss same with PGM and JGB; call with opposing counsel re: remaining issues; discuss adjournment with PGM and JGB and edit opposing counsel's draft letter to Court; discuss whether to include draft of settlement agreement with letter.	SS	\$375	\$1,575
11/18/2014	6.1	Correspond with potential class members; update class member database; update billing entries; research motions for preliminary approval; research cy pres distributions; edit all settlement documents; discuss settlement with SS and correspond with opposing counsel concerning same; draft email language concerning settlement edits.	PGM	\$295	\$1,800
11/19/2014	1.3	Draft application for attorneys' fees	ANW	\$285	\$371
11/19/2014	1.1	Correspond with case team concerning settlement; discuss purposed terms with SS; email exchanges with adversary re settlement and franchise issue	JGB	\$690	\$759
11/19/2014	0.1	Reviewed third Letter Motion for Extension of Time addressed to Judge Sidney H. Stein from Peter T. Shapiro.	JLN	\$570	\$57
11/19/2014	1.7	Discuss with PGM re: number of franchises served and review emails re: same; review letter to Court re: adjournment and send email to opposing counsel re: filing same; discuss with JGB re: potential ways to proceed in light of franchise issues.	SS	\$375	\$638
11/19/2014	2.1	Generate billing and expenses reports for review; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$620
11/20/2014	7.1	Draft application for attorneys' fees.	ANW	\$285	\$2,024
11/20/2014	0.5	Correspond with opposing counsel concerning settlement terms and scheduling phone call; discuss franchise issues with SS	JGB	\$690	\$345

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/20/2014	0.1	Reviewed Order granting Letter Motion for Extension of Time.	JLN	\$570	\$57
11/20/2014	1.7	Discuss with JGB re: how to proceed in light of opposing counsel's settlement suggestions; discuss with PGM re: correspondence with potential class member; email exchange with opposing counsel re: scheduling call and discuss same with JGB; review application for attorneys' fees and discuss same with JGB and ANW.	SS	\$375	\$638
11/20/2014	1.4	Review correspondence between counsel; correspond with potential class members; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$413
11/21/2014	0.8	Correspond with opposing counsel concerning scheduling of phone conference; discuss with outside counsel concern re: settlement and franchises	JGB	\$690	\$552
11/21/2014	0.1	Complete weekly organization, review, and update of case documents.	PGM	\$295	\$30
11/23/2014	0.1	Review and give thoughts on plan memorandum	JGB	\$690	\$69
11/24/2014	0.5	Call with opposing counsel re: settlement agreement and discuss same with JGB.	SS	\$375	\$188
11/24/2014	0.4	Call with adversary re settlement; follow up with case team	JGB	\$690	\$276
11/25/2014	1.1	Correspond with case team concerning opposing counsel's edits to settlement agreement; correspond with PGM concerning inquiry from class member; review counsel's proposed edits and lay out plan to case team	JGB	\$690	\$759

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/25/2014	1.4	Review opposing counsel's latest draft of settlement agreement and send email to case team re: comments on other proposed changes and terms; review JGB's response re: same; discuss with PGM re: correspondence with potential class members and edit email language re: opt-out terms.	SS	\$375	\$525
11/25/2014	0.1	Meet with PGM to discuss next steps: settlement agreement.	KK	\$410	\$41
11/25/2014	1.1	Correspond with potential class members; update class member database; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$325
11/26/2014	0.2	Correspond with case team concerning communication with opposing counsel and settlement; email exchange with adversary	JGB	\$690	\$138
11/26/2014	0.3	Monthly review of documents, filings, contacts, and other summary and general case information.	PGM	\$295	\$89
11/30/2014	0.1	Review and give thoughts on plan memorandum	JGB	\$690	\$69
12/1/2014	1.9	Correspond with case team, class representatives, and opposing counsel concerning settlement terms; review and edit emails to clients and adversary.	JGB	\$690	\$1,311
12/1/2014	0.5	Reviewed revised settlement paperwork with red line changes, as well as follow-up e-mails between counsel regarding same, multiple additional e-mails throughout the day regarding revisions to settlement agreement, and reviewed defense counsel's request for 4th extension.	JLN	\$570	\$285

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/1/2014	4.4	Edit settlement agreement and discuss same with JGB and PGM; email exchange with opposing counsel re: same; draft email to class representatives re: near final draft of agreement; call with claim administrator re: timing of depositing money in trust by defendants; discuss final billable amount with JGB and PGM and send same to opposing counsel; edit letter to court re: adjournment and email comments re: same to opposing counsel; review edits to all exhibits including claim form and notice.	SS	\$375	\$1,650
12/1/2014	6.3	Correspond with potential class members; draft update on status of action; correspond with opposing counsel concerning settlement status; update billing records; edit settlement documents; generate billing report; discuss settlement terms with SS.	PGM	\$295	\$1,859
12/2/2014	0.1	Meet with PGM to discuss next steps: edits to settlement agreement; corresponding with class members.	KK	\$410	\$41
12/2/2014	0.6	Correspond with and discuss with case team settlement language and opposing counsel's proposals to change.	JGB	\$690	\$414
12/2/2014	0.1	Multiple follow-up calls between counsel re: settlement terms.	JLN	\$570	\$57
12/2/2014	1.8	Edit settlement agreement and accompanying documents per conversation with opposing counsel; discuss same with case team; email exchange with claims administrator; review email exchange with class representatives.	SS	\$375	\$675
12/2/2014	1.5	Review correspondence concerning settlement; compile class representative correspondence and follow-up concerning settlement agreement; correspond with claims administrator; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$443

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/3/2014	2.4	Correspond with opposing counsel, class representatives, and case team concerning settlement terms; discuss with case team; review and negotiate re: certain terms with adversary; review settlement stip; discuss with outside counsel.	JGB	\$690	\$1,656
12/3/2014	0.1	Reviewed e-mail from JGB to James Tortora regarding answers to his questions; reviewed e-mail exchanges regarding last minute change proposed by defense counsel.	JLN	\$570	\$57
12/3/2014	3.7	Edit settlement agreement to incorporate terms changes; email exchange with claims administrator re: costs estimate; email exchange re: same with opposing counsel; review order re: extension and instruction how to file and discuss same with PGM; review relevant rules re: same; email exchange with opposing counsel re: unresolved terms and how to handle filing in light of same; email exchange with JGB re: same.	SS	\$375	\$1,388
12/3/2014	3.5	Sort, save, and code documents into firm's practice management and documents database; correspond with claims administrator concerning vouchers and estimate of costs; review correspondence with opposing counsel concerning settlement terms; discuss settlement with case team; assemble class correspondence language.	PGM	\$295	\$1,033
12/4/2014	0.5	Correspond with case team and clients concerning status of settlement and next steps.	JGB	\$690	\$345
12/4/2014	0.6	Call with claim administrator and discuss next steps; email exchange re: same; discuss with PGM re: getting claim administrators outstanding documents.	SS	\$375	\$225

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/4/2014	1.1	Sort, save, and code documents into firm's practice management and documents database; correspond with opposing counsel concerning exhibits; prepare exhibits to settlement; file exhibits with court; correspond with claims administrator and class representatives concerning status of settlement.	PGM	\$295	\$325
12/4/2014	0.4	Convert documents to PDF/A format and send to PGM.	MMH	\$295	\$118
12/5/2014	0.6	Correspond with case team and class representatives concerning settlement; review correspondence with adversary.	JGB	\$690	\$414
12/5/2014	0.2	Reviewed final stipulation.	JLN	\$570	\$114
12/5/2014	1.8	Review final version of proposed settlement agreement from opposing counsel; discuss same with PGM and email JGB re: changes; email opposing counsel re: same; discuss next steps with PGM and send email to case team re: same and deadlines.	SS	\$375	\$675
12/5/2014	0.8	Complete weekly update, review, and organization of case files; draft plan email and discuss with SS; review settlement document.	PGM	\$295	\$236
12/7/2014	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
12/8/2014	0.1	Email with claims administrator re potential cy pres beneficiary.	JGB	\$690	\$69
12/8/2014	1	Sort, save, and code documents into firm's practice management and documents database; update database of potential class members; update billing information; correspond with potential class members; discuss class member correspondence with SS.	PGM	\$295	\$295
12/9/2014	0.2	Discuss with PGM re: drafting of fee application.	SS	\$375	\$75
12/9/2014	1.8	Review and edit fees application.	PGM	\$295	\$531

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/10/2014	0.3	Discuss fees application with SS; edit application for fees.	PGM	\$295	\$89
12/10/2014	0.3	Discuss motion for attorneys' fees with PGM; discuss progress of same with JGB.	SS	\$375	\$113
12/11/2014	0.1	Discuss with PGM re: drafting of attorneys' fees motion.	SS	\$375	\$38
12/11/2014	1.7	Correspond with potential class members; edit fees motion; save, sort, and code documents into firm's electronic management system.	PGM	\$295	\$502
12/12/2014	1.2	Complete weekly review, update, and organization of case files; correspond with potential class members; review class size estimates and calculations for fee application; draft plan for next week tasks; discuss preliminary approval motion with SS.	PGM	\$295	\$354
12/14/2014	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
12/15/2014	2.3	Email exchange with opposing counsel re: defendants' misrepresentations to one of potential class members re: status of settlement; review information provided by potential class member re: same; discuss with PGM re: correspondence with potential class members; review motion for preliminary approval and research re: same.	SS	\$375	\$863
12/15/2014	0.1	Touch base with case team re IJL-client communication.	JGB	\$690	\$69
12/15/2014	4.1	Correspond with potential class members; draft email to counsel; draft motion for preliminary approval.	PGM	\$295	\$1,210
12/16/2014	0.1	Meet with PGM to discuss next steps: motion for preliminary approval.	KK	\$410	\$41

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/16/2014	1.8	Email exchange with opposing counsel re: discussions between defendants and potential class member; discuss with JGB re: arranging a call and email exchange re: same; research re: conflict of interest if potential class member seeks individual compensation and discuss same with PGM and JGB.	SS	\$375	\$675
12/16/2014	5.3	Draft motion for preliminary approval and discuss same with SS; correspond with potential class members.	PGM	\$295	\$1,564
12/17/2014	1.2	Discuss with JGB and PGM re: potential class member's communication with IJL; email potential class member re: same; discuss with PGM re: motion for preliminary approval and affidavits needed in support of same from IJL; start reviewing draft of same.	SS	\$375	\$450
12/17/2014	4	Correspond with potential class members; draft motion for preliminary approval.	PGM	\$295	\$1,180
12/18/2014	0.3	Sort, save, and code documents into firm's practice management and documents database; correspond with class member; update court binder.	PGM	\$295	\$89
12/19/2014	1.1	Edit preliminary approval motion and discuss same with PGM; draft plan email to case team and discuss same with PGM.	SS	\$375	\$413
12/19/2014	1.2	Draft and send email to case team re: upcoming tasks and deadlines; review preliminary approval motion and discuss same with PGM.	SS	\$375	\$450
12/19/2014	1.1	Complete weekly review, organization, and update of case files; draft plan for next steps; edit preliminary approval motion and discuss same with SS.	PGM	\$295	\$325
12/21/2014	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/22/2014	2.3	Edit motion for preliminary approval and discuss same with PGM; research caselaw re: same and send same with JGB.	SS	\$375	\$863
12/22/2014	3.6	Draft preliminary approval motion; correspond with potential class members.	PGM	\$295	\$1,062
12/22/2014	1.5	Review and begin edit of preliminary approval papers	JGB	\$690	\$1,035
12/23/2014	0.1	Correspond with case team concerning preliminary approval motion.	JGB	\$690	\$69
12/23/2014	0.8	Review email from JGB re: edits to motion for preliminary injunction and discuss same with PGM; review attorneys' fees application.	SS	\$375	\$300
12/31/2014	0.1	Correspond with potential class member.	PGM	\$295	\$30
1/2/2015	0.4	Discuss with PGM re: drafting of attorneys' fees application; email to case team re: plan of how to proceed with various assignments.	SS	\$375	\$150
1/2/2015	0.8	Complete weekly update, organization, and review of case files; correspond with potential class members; draft update on case status to potential class members.	PGM	\$295	\$236
1/4/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
1/5/2015	0.7	Correspond with potential class members.	PGM	\$295	\$207
1/6/2015	0.6	Review status of fee application and review JGB's email re: edits to preliminary approval motion.	SS	\$375	\$225
1/6/2015	0.1	Meet with PGM regarding next steps: motion for fees.	KK	\$410	\$41
1/6/2015	0.5	Correspond with potential class members.	PGM	\$295	\$148
1/7/2015	0.3	Correspond with case team concerning class member communication; respond to and review potential class member inquiries.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/7/2015	3.4	Correspond with potential class members; edit class member communication memo; draft motion for fees.	PGM	\$295	\$1,003
1/8/2015	1.2	Discuss with PGM re: fees application; research re: service award requirements; discuss with JGB re: motion for preliminary approval.	SS	\$375	\$450
1/8/2015	1.8	Correspond with potential class members; update class member database; draft motion for fees and research service fee authority.	PGM	\$295	\$531
1/9/2015	1.9	Complete weekly update, organization, and review of case files; compile case information for liability insurance renewal; correspond with potential class members.	PGM	\$295	\$561
1/11/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
1/12/2015	0.1	Discuss with JGB re: status of edits to motion for preliminary approval.	SS	\$375	\$38
1/13/2015	0.8	Email exchange with claims administrator; discuss same with PGM; review attorney general notification requirements.	SS	\$375	\$300
1/14/2015	0.4	Draft motion for preliminary approval and discuss with SS; correspond with potential class member.	PGM	\$295	\$118
1/14/2015	0.4	Discuss with JGB re: edits to preliminary approval motion; discuss same with PGM; review email exchange with opposing counsel re: Court's inquiry.	SS	\$375	\$150
1/15/2015	1.3	Edit preliminary approval motion and correspond with case team concerning same.	JGB	\$690	\$897
1/15/2015	0.7	Review cases re: quality of opposing counsel affecting application for attorneys fees; review draft of same.	SS	\$375	\$263
1/15/2015	2.1	Review edits to preliminary approval motion; edit preliminary approval motion.	PGM	\$295	\$620

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/16/2015	0.3	Discuss with PGM re: editing motion for preliminary approval; draft email to case team re: upcoming deadlines.	SS	\$375	\$113
1/16/2015	0.4	Complete weekly update, organization, and review of case files; correspond with potential class member.	PGM	\$295	\$118
1/19/2015	0.1	Review and give thoughts on plan memorandum	JGB	\$690	\$69
1/20/2015	0.1	Meet with PGM regarding next steps: motion for preliminary approval.	KK	\$410	\$41
1/20/2015	0.7	Correspond with potential class members.	PGM	\$295	\$207
1/21/2015	0.1	Discuss with PGM re: editing preliminary approval motion.	SS	\$375	\$38
1/21/2015	5.1	Correspond with potential class members; edit preliminary approval motion.	PGM	\$295	\$1,505
1/22/2015	0.1	Discuss edits to fees motion with PGM.	TJF	\$440	\$44
1/22/2015	0.2	Correspond with potential class member.	PGM	\$295	\$59
1/23/2015	0.3	Discuss with PGM re: edits to preliminary approval motion; email to case team re: upcoming tasks and deadlines.	SS	\$375	\$113
1/23/2015	0.5	Complete weekly update, review, and organization of case files; correspond with potential class members.	PGM	\$295	\$148
1/26/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
1/26/2015	0.6	Edit motion for preliminary approval.	SS	\$375	\$225
1/26/2015	0.2	Correspond with potential class member.	PGM	\$295	\$59
1/27/2015	0.1	Correspond with analyst concerning potential class member inquiry.	JGB	\$690	\$69
1/27/2015	1.2	Edit motion for preliminary approval of settlement.	SS	\$375	\$450

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/27/2015	0.3	Respond to inquiry.	PGM	\$295	\$89
1/28/2015	0.6	Discuss with PGM re: correspondance with potential class member; edit motion for preliminary approval.	SS	\$375	\$225
1/28/2015	0.2	Discuss class member question with SS; respond to inquiry.	PGM	\$295	\$59
1/29/2015	0.4	Discuss with PGM re: correspondance with potential class member and preserving the email chain for potential future use.	SS	\$375	\$150
1/29/2015	0.3	Discuss response to class member with SS; respond to class member inquiry.	PGM	\$295	\$89
1/30/2015	0.2	Send email to case team re: upcoming dates and deadlines.	SS	\$375	\$75
1/30/2015	0.3	Complete weekly update, organization, and review of case files; respond to inquiries.	PGM	\$295	\$89
2/1/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
2/2/2015	0.2	Correspond with class members.	PGM	\$295	\$59
2/3/2015	0.1	Discuss next steps with PGM: fees motion.	KK	\$410	\$41
2/4/2015	3	Draft fees application and conduct related research.	PGM	\$295	\$885
2/5/2015	0.1	Discuss with PGM re: communication with class members.	SS	\$375	\$38
2/5/2015	0.3	Communicate with class member.	PGM	\$295	\$89
2/6/2015	0.1	Discuss class member communication with analyst.	JGB	\$690	\$69
2/6/2015	0.5	Discuss correspondance with class members with PGM; discuss following up with Court with JGB; send email to case team re: plan and deadlines.	SS	\$375	\$188

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/6/2015	1.9	Complete weekly update, organization, and review of case files; discuss settlement status with SS; correspond with class members; update class member database; discuss potential media story on IJL with JGB.	PGM	\$295	\$561
2/8/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
2/9/2015	0.7	Correspond with class members.	PGM	\$295	\$207
2/10/2015	0.1	Correspond with analyst concerning communications with reporter.	JGB	\$690	\$69
2/10/2015	0.6	Document call with court; correspond with reporter; correspond with class members.	PGM	\$295	\$177
2/13/2015	0.1	Correspond with class member concerning news report.	JGB	\$690	\$69
2/13/2015	0.3	Complete weekly update, review, and organization of case files; correspond with class member.	PGM	\$295	\$89
2/16/2015	0.3	Email exchange with JGB re: follow up with Court and new control date to do same.	SS	\$375	\$113
2/16/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
2/19/2015	0.3	Discuss with PGM re: correspondance with class members.	SS	\$375	\$113
2/19/2015	0.9	Correspond with class members.	PGM	\$295	\$266
2/19/2015	0.1	Discuss status of case including continued communication with class members.	TJF	\$440	\$44
2/20/2015	1.1	Complete weekly update, review, and organization of case files; discuss preliminary approval and fees application status with SS; edit motion for fees.	PGM	\$295	\$325
2/20/2015	1.8	Edit application for attorneys' fees and preliminary approval motion and discuss same with PGM; discuss weekly plan email to PGM.	SS	\$375	\$675

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/22/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
2/24/2015	0.3	Correspond with class members.	PGM	\$295	\$89
2/25/2015	0.2	Correspond with class member.	PGM	\$295	\$59
2/26/2015	0.8	Discuss with PGM and edit motion for preliminary approval; discuss with PGM re: editing section of fee application.	SS	\$375	\$300
2/26/2015	0.3	Discuss fees application edits with SS.	PGM	\$295	\$89
2/27/2015	0.9	Complete weekly organization, update, and review of case files; respond to inquiries; update class member database; review and edit fees application.	PGM	\$295	\$266
2/27/2015	0.1	Discuss status of fees application and preliminary approval motion with PGM.	SS	\$375	\$38
3/1/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
3/1/2015	0.1	Review email concerning next steps in case.	SS	\$375	\$38
3/2/2015	1.9	Edit fees application brief; correspond with class members; review case history for inclusion of relevant facts in fees application.	PGM	\$295	\$561
3/3/2015	0.2	Email exchange with PGM re: monthly update to class members.	SS	\$375	\$75
3/3/2015	1.1	Edit fees application; draft monthly update on case status.	PGM	\$295	\$325
3/4/2015	0.1	Discuss case status and next steps with PGM.	SS	\$375	\$38
3/4/2015	0.7	Edit fees application and review relevant case history.	PGM	\$295	\$207
3/5/2015	0.1	Discuss progress of fees application with PGM.	TJF	\$440	\$44
3/5/2015	0.3	Review procedural posture section of attorneys' fees memo.	SS	\$375	\$113

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/5/2015	0.1	Troubleshoot mailing list error.	PGM	\$295	\$30
3/6/2015	0.2	Obtain articles; sort, save, and code same.	MMH	\$295	\$59
3/6/2015	1.6	Correspond with class representatives and case team to address questions concerning settlement terms; review previous correspondence; discuss with case team; review schedule.	JGB	\$690	\$1,104
3/6/2015	3.3	Correspond with class members and case team; discuss same with PGM and JGB; initiate and attend conference call and email class representatives re: same; review and edit JGB's email to class representatives; review past correspondence re: settlement draft; discuss with PGM various research re: class representatives and review studies re: service fees.	SS	\$375	\$1,238
3/6/2015	0.1	Discuss case status and next steps with PGM.	SS	\$375	\$38
3/6/2015	2.8	Review class member correspondence; correspond with class administrator; set up conference call; update recent class representative record of correspondence; correspond with case team concerning class representative concerns; complete weekly update, organization, and review of case files.	PGM	\$295	\$826
3/8/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
3/8/2015	0.1	Review case plan and notes on status from JGB.	SS	\$375	\$38
3/9/2015	0.3	Review JGB's email to class representatives; discuss with PGM re: edits to attorneys' fees memorandum.	SS	\$375	\$113
3/9/2015	0.1	Review class member correspondence.	PGM	\$295	\$30
3/10/2015	1.7	Respond to inquiries; assemble chain of correspondence with class members.	PGM	\$295	\$502

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/11/2015	0.3	Correspond with case team concerning fees application; correspond with potential client re: issues in matter.	JGB	\$690	\$207
3/11/2015	0.7	Discuss with PGM re: call to Court; discuss same with JGB; review motion for attorneys' fees and for preliminary approval and JGB's email re: same.	SS	\$375	\$263
3/11/2015	0.3	Correspond with class member.	PGM	\$295	\$89
3/12/2015	0.6	Discuss with PGM re: email exchange with former class representative; edit same and review past correspondance re: same.	SS	\$375	\$225
3/12/2015	0.2	Correspond with possible class member re: inclusion in class; follow up with case team.	JGB	\$690	\$138
3/12/2015	0.2	Edit response to class member inquiry and send.	PGM	\$295	\$59
3/13/2015	0.1	Complete weekly review, update, and organization of case files.	PGM	\$295	\$30
3/15/2015	0.1	Review and give thoughts on case memorandum.	JGB	\$690	\$69
3/15/2015	0.1	Review JGB's comments on weekly case plan and status report.	SS	\$375	\$38
3/16/2015	0.1	Review potential class members correspondence.	PGM	\$295	\$30
3/17/2015	1.4	Correspond with potential class members.	PGM	\$295	\$413
3/17/2015	0.1	Discuss case status and next steps with PGM.	SS	\$375	\$38
3/18/2015	0.9	Correspond with potential class members.	PGM	\$295	\$266
3/20/2015	0.1	Correspond with analyst concerning phone call follow-up responses to inquiries.	JGB	\$690	\$69
3/20/2015	1.8	Complete weekly review, update, and organization of documents; correspond with potential class members; update class member database.	PGM	\$295	\$531
3/22/2015	0.1	Review and give thoughts on plan memorandum	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/22/2015	0.1	Review case plan and JGB comments on next steps.	SS	\$375	\$38
3/23/2015	0.6	Correspond with analyst concerning inquiry from potential class member; discuss with outside lawyer settlement issues	JGB	\$690	\$414
3/23/2015	0.1	Review email from JGB re: upcoming plan and deadlines.	SS	\$375	\$38
3/23/2015	0.4	Review class member correspondence.	PGM	\$295	\$118
3/24/2015	0.1	Discuss with PGM re: correspondance with potential class members.	SS	\$375	\$38
3/24/2015	0.7	Correspond with potential class members.	PGM	\$295	\$207
3/26/2015	0.1	Correspond with case team concerning fee application.	JGB	\$690	\$69
3/26/2015	0.2	Email exchange with JGB re: edits to attorneys' fees and preliminary approval motion; discuss same with JGB.	SS	\$375	\$75
3/27/2015	0.8	Edit fees application.	JGB	\$690	\$552
3/27/2015	0.1	Complete weekly review, organization, and update of case files.	PGM	\$295	\$30
3/29/2015	0.1	Review plan status and next steps.	SS	\$375	\$38
3/29/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
3/31/2015	1.1	Correspond with potential class members; update class member database; complete monthly update, review, and organization of case files.	PGM	\$295	\$325
3/31/2015	0.2	Discuss class member communication with PGM.	SS	\$375	\$38
4/2/2015	0.4	Discuss with PGM re: correspondance with clients and monthly update.	SS	\$375	\$150

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/2/2015	0.7	Correspond with potential class members; draft monthly update to clients.	PGM	\$295	\$207
4/3/2015	0.8	Complete weekly update, organization, and review of case files; review edits to fee application and discuss with SS; follow up with potential class member.	PGM	\$295	\$236
4/5/2015	0.1	Review and give thoughts on plan memorandum	JGB	\$690	\$69
4/5/2015	0.1	Review weekly plan and case status.	SS	\$375	\$38
4/6/2015	0.1	Correspond with case team concerning media inquiry.	JGB	\$690	\$69
4/6/2015	0.1	Review potential class member correspondence.	PGM	\$295	\$30
4/8/2015	1.1	Correspond with potential class members.	PGM	\$295	\$325
4/9/2015	0.2	Correspond with case team concerning procedural history; correspond with case team concerning response to potential class member.	JGB	\$690	\$138
4/9/2015	1.6	Review history of class representatives; draft response to class member and discuss status of class member's claims with SS; outline factual history of efforts of counsel and correspond with case team concerning same.	PGM	\$295	\$472
4/10/2015	0.1	Correspond with case team concerning media inquiry.	JGB	\$690	\$69
4/10/2015	0.2	Email to case team re: plan and deadline for upcoming week.	SS	\$375	\$75
4/10/2015	0.1	Complete weekly update, organization, and review of case files.	PGM	\$295	\$30
4/12/2015	0.1	Review and give thoughts on plan memorandum.	JGB	\$690	\$69
4/12/2015	0.1	Review weekly case summary and plan for next steps.	SS	\$375	\$38

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/13/2015	4.7	Correspond with potential class members; edit fees application.	PGM	\$295	\$1,387
4/13/2015	0.6	Take notes on phone call between potential client and PGM; enter phone note.	TAG	\$285	\$171
4/14/2015	0.7	Edit motion for preliminary approval.	SS	\$375	\$263
4/14/2015	2.6	Correspond with potential class member to schedule time to speak; discuss edits to fees application with SS; edit fees application; research common benefit doctrine.	PGM	\$295	\$767
4/15/2015	0.4	Call with potential class member and discuss same with PGM; discuss with PGM re: public benefit prong of argument in preliminary approval motion.	SS	\$375	\$150
4/16/2015	0.9	Discuss with PGM re: correspondance with potential class members; review motion for preliminary approval and for attorneys' fees.	SS	\$375	\$338
4/16/2015	2.6	Discuss response to inquiry with SS; respond to inquiries; edit application for fees.	PGM	\$295	\$767
4/17/2015	1.2	Email to opposing counsel re: documents in support of motion for preliminary approval; discuss same with JGB; edit motion for preliminary approval; review email exchange with case team re: Connecticut department for consumer protection.	SS	\$375	\$450
4/19/2015	0.1	Review weekly case plan and next steps.	SS	\$375	\$38
4/20/2015	2.6	Correspond with potential class members; draft fees motion; update class member database.	PGM	\$295	\$767
4/21/2015	0.2	Discuss next steps and fee application with PGM.	MWS	\$490	\$49
4/21/2015	4.9	Draft fees application; correspond with potential class members.	PGM	\$295	\$1,446
4/22/2015	6.8	Draft fees applications; research relevant litigation history.	PGM	\$295	\$2,006

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/23/2015	7.2	Draft fees application and review relevant litigation history.	PGM	\$295	\$2,124
4/24/2015	1.2	Review new authority re: CAFA valuation of settlement; edit attorneys' fees application.	SS	\$375	\$450
4/24/2015	3.1	Complete weekly update, organization and review of case files; edit application for fees.	PGM	\$295	\$915
4/26/2015	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
4/26/2015	0.1	Review case status and weekly plan.	SS	\$375	\$0
4/27/2015	0.1	Discuss next steps and fee application with PGM.	MWS	\$490	\$0
4/27/2015	0.1	Email to CT attorney re next steps	JGB	\$690	\$69
4/27/2015	1.4	Correspond with potential class members; update class member database.	PGM	\$295	\$413
4/28/2015	0.1	Follow up with Connecticut consumer protection attorney concerning status of case.	JGB	\$690	\$69
4/28/2015	1.5	Call potential class members; respond to class member inquiries.	PGM	\$295	\$443
4/29/2015	2.2	Edit motion for preliminary approval and for attorneys' fees; email same to JGB and discuss same with PGM; review caselaw re: same; review email exchange with opposing counsel and discuss with PGM re: contacting Court re: status.	SS	\$375	\$825
4/29/2015	0.6	Correspond with Connecticut consumer protection attorney concerning case status; correspond with case team concerning fees application and preliminary approval application	JGB	\$690	\$414
4/29/2015	0.1	Discuss status and next steps with PGM.	TJF	\$440	\$0
4/29/2015	2.5	Correspond with potential class members; edit preliminary approval motion and fees application; draft letter requesting update.	PGM	\$295	\$738

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/30/2015	0.4	Email exchange with claim administrator re: status of case; discuss voice mail re: same with JGB; discuss same with PGM.	SS	\$375	\$150
5/1/2015	0.1	Correspond with case team concerning fees application and preliminary approval motion; review status inquiry letter to court.	JGB	\$690	\$69
5/1/2015	0.3	Email exchange with JGB re: preliminary approval motions granted by Judge Stein; email case team re: upcoming deadlines and plan.	SS	\$375	\$113
5/1/2015	0.4	Correspond with case team concerning status inquiry to court; review status of fees application draft; review status inquiry letter in preparation for Monday filing.	PGM	\$295	\$118
5/3/2015	0.1	Review case status and plan email.	SS	\$375	\$0
5/4/2015	0.1	Line edit status inquiry letter.	MMH	\$295	\$30
5/4/2015	0.1	Discuss weekly tasks with PGM.	JLM	\$460	\$0
5/4/2015	0.2	Review letter filed with Court re: status of settlement; review email to opposing counsel re: same.	SS	\$375	\$75
5/4/2015	2.4	Correspond with potential class members; file status inquiry letter; search for fee applications listing comparable rates; update class member database.	PGM	\$295	\$708
5/5/2015	0.3	Discuss with PGM re: potential class members' inquiries.	SS	\$375	\$113
5/5/2015	0.1	Discuss next steps and fee application with PGM.	MWS	\$490	\$0
5/5/2015	1.3	Discuss with SS filing of inquiry letter and edits to monthly update and class member correspondence; update class member database; send monthly update.	PGM	\$295	\$384
5/6/2015	0.1	Troubleshoot monthly update mailing list.	PGM	\$295	\$30

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/7/2015	2	Troubleshoot mailing list; review MailChimp account and discuss new mailing procedure with MJN; review email templates and work on design.	PGM	\$295	\$590
5/8/2015	1.2	Complete weekly update, organization, and review of case files; review mailing list template; edit template; edit, test, and execute mailing list campaign using new software and mailing protocol.	PGM	\$295	\$354
5/10/2015	0.1	Review weekly email concerning case plan and status.	SS	\$375	\$0
5/11/2015	0.5	Correspond with potential class members.	PGM	\$295	\$148
5/12/2015	0.2	Update court binder.	KMB	\$295	\$59
5/12/2015	0.2	Discuss with PGM re: communication with potential class member who is pursuing individual action.	SS	\$375	\$75
5/12/2015	0.3	Correspond with potential class members and discuss inquiry with SS.	PGM	\$295	\$89
5/13/2015	0.4	Discuss with PGM re: correspondance with potential class member re: another suit; research re: same.	SS	\$375	\$150
5/14/2015	0.6	Review recent cases re: voucher settlements and discuss same with JGB and PGM; discuss with PGM re: summary of authority.	SS	\$375	\$225
5/14/2015	0.5	Brief case concerning CAFA.	PGM	\$295	\$148
5/15/2015	0.1	Complete weekly update, organization, and review of case documents.	PGM	\$295	\$30
5/17/2015	0.1	Review case status and next steps.	SS	\$375	\$0
5/18/2015	0.3	Email exchange with JGB re: edits to motion for preliminary approval and for attorneys' fees; review email exchange with potential class members.	SS	\$375	\$113

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/18/2015	0.9	Sort, save, and code documents into firm's practice management and documents database; correspond with potential class members; review class member documentation; update mailing list and class member database.	PGM	\$295	\$266
5/19/2015	0.1	Discuss next steps including fee application with PGM.	MWS	\$490	\$0
5/19/2015	0.8	Brief case concerning Class Action Fairness Act ruling.	PGM	\$295	\$236
5/20/2015	0.7	Discuss case and transition with SS and PGM.	TAG	\$285	\$200
5/20/2015	1.1	Discuss with staff re: transition of case to TAG; meet with PGM and TAG re: handling of potential class members calls and correspondance; follow up re: same; review email exchange with named plaintiff re: communication from defendant.	SS	\$375	\$413
5/20/2015	1.4	Discuss possible law student projects with SS; discuss transfer of case with SS and TAG; correspond with potential class members; create plan of transfer.	PGM	\$295	\$413
5/21/2015	0.4	Discuss with PGM and sit in on phone call to potential client.	TAG	\$285	\$114
5/21/2015	0.3	Discuss case transition with PGM and TAG; review class members correspondance.	SS	\$375	\$113
5/21/2015	0.7	Correspond with potential class members and discuss class member communication with analyst.	PGM	\$295	\$207
5/21/2015	0.1	Discuss next steps with TAG.	MWS	\$490	\$0
5/22/2015	0.2	Discuss with PGM and sit in on phone call.	TAG	\$285	\$57
5/22/2015	2.1	Discuss case history with analyst in preparation for transition; review and edit fees and preliminary approval motions; complete weekly update organization and review of case files.	PGM	\$295	\$620

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/25/2015	0.9	Review and give thoughts on case summary memorandum; review and edit fee application documents.	JGB	\$690	\$621
5/26/2015	0.4	Discuss case status and next steps with PGM and BLG.	TAG	\$285	\$114
5/26/2015	1	Meeting with PGM and TAG regarding proposed settlement; reviewing proposed settlement	BLG	\$290	\$290
5/26/2015	1	Discuss case history and settlement proceedings with analyst and legal apprentice in preparation for transition; review emails from potential class members.	PGM	\$295	\$295
5/27/2015	0.4	Discuss with SS and PGM; sit in on phone call to potential class member with PGM; email potential class member following phone call; update class mailing list.	TAG	\$285	\$114
5/27/2015	1.2	Review motion for preliminary approval and notice of proposed settlement	BLG	\$290	\$348
5/27/2015	0.4	Discuss with PGM and TAG re: correspondance with potential class members; discuss re: correspondance with former employee and review exchange re: same.	SS	\$375	\$150
5/27/2015	1.8	Discuss class member inquiries with SS; correspond with potential class members and discuss with TAG; update class member database and mailing list.	PGM	\$295	\$531
5/27/2015	0.3	Review draft of fee application papers	JGB	\$690	\$207
5/28/2015	0.9	Review complaint to get caught up on the case	BLG	\$290	\$261
5/28/2015	0.6	Discuss case facts with PGM; line edit reply email to potential class member; email MJN re: forwarding emails from matter email address.	TAG	\$285	\$171

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/28/2015	0.3	Review correspondance with potential class members; review PGM's email re: monthly update to class members.	SS	\$375	\$113
5/28/2015	0.2	Discuss daily tasks with BG; discuss transition issues with PGM and TAG.	JLM	\$460	\$0
5/28/2015	2	Correspond with potential class members; discuss transition of case with analyst; prepare transition notes for analyst; draft monthly update.	PGM	\$295	\$590
5/29/2015	0.8	Review email exchange with class member; discuss with TAG and PGM re: email to case team re: plan and deadlines; review and edit monthly update email.	SS	\$375	\$263
5/29/2015	1.6	Complete monthly review, organization, and update of case files; save, sort, and code documents in electronic case management tool; discuss and edit potential class member correspondence with TAG.	PGM	\$295	\$472
5/29/2015	1.6	Discuss with PGM; email potential class members; send case plan memorandum to case team; discuss draft email with SS.	TAG	\$285	\$456
5/30/2015	0.3	Review and provide edits on settlement and fee papers	JGB	\$690	\$207
6/1/2015	2.3	Discuss with SS; send monthly update email; correspond with potential class members; update class member database and mailing list.	TAG	\$285	\$656
6/1/2015	0.1	Review and give thoughts on case plan memorandum.	JGB	\$690	\$69
6/1/2015	0.2	Discuss weekly tasks with TAG and BG.	JLM	\$460	\$46
6/1/2015	0.8	Discuss with TAG re: correspondance with potential class members; review same.	SS	\$375	\$300
6/2/2015	2.1	Correspond with potential class members; discuss same with SS; update class member database and mailing list.	TAG	\$285	\$599

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/2/2015	0.1	Discuss next steps with BLG.	MWS	\$490	\$0
6/2/2015	0.8	Review correspondance with potential class members and draft and edit same; discuss same with TAG; discuss with TAG re: scheduling call with potential class member and her questions.	SS	\$375	\$300
6/3/2015	0.8	Correspond with potential class members; discuss same with SS; update class member database and mailing list.	TAG	\$285	\$228
6/4/2015	1.2	Correspond with potential class member via email and telephone; take notes on telephone call between SS and potential class member; enter phone notes; update class member database.	TAG	\$285	\$342
6/4/2015	0.1	Discuss daily tasks with TAG.	JLM	\$460	\$0
6/5/2015	0.8	Complete weekly update, organization, and review of case files; update case summary memorandum; draft correspondence to potential class member; discuss same with SS.	TAG	\$285	\$228
6/5/2015	0.1	Review email from potential class member and forward to case team.	JGB	\$690	\$69
6/8/2015	0.4	Correspond with potential class member and discuss same with SS.	TAG	\$285	\$114
6/8/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/8/2015	0.4	Edit correspondance with potential class members and discuss same with TAG.	SS	\$375	\$150
6/9/2015	2.4	Correspond with potential class members; discuss same with SS; update class member database and mailing list; review motion for attorneys' fees and motion for preliminary approval; make edits to same.	TAG	\$285	\$684

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/9/2015	4.9	Research calculation of injunctive relief in class actions and draft memo in regards to attorney's fees based on injunctive relief; discuss injunctive relief value with SS	BLG	\$290	\$1,421
6/10/2015	0.2	Correspond with potential class members.	TAG	\$285	\$57
6/10/2015	0.2	Email exchange re: TAG's availability and discuss with TAG re: correspondance with potential class members.	SS	\$375	\$75
6/11/2015	0.2	Correspond with potential class members; update class member database and mailing list.	TAG	\$285	\$57
6/12/2015	0.2	Email to case team re: next steps and deadlines; review previous plans re: same.	SS	\$375	\$75
6/15/2015	0.4	Correspond with potential class members; update class member database and mailing list.	TAG	\$285	\$114
6/15/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/16/2015	0.3	Review email exchange with potential class members.	SS	\$375	\$113
6/16/2015	0.2	Correspond with potential class members.	TAG	\$285	\$57
6/16/2015	0.1	Correspond with TAG re: communication with potential class member.	JGB	\$690	\$69
6/17/2015	0.4	Correspond with potential class members; update class member database and mailing list.	TAG	\$285	\$114
6/18/2015	0.5	Correspond with potential class member; discuss same with SS.	TAG	\$285	\$143
6/19/2015	0.3	Discuss with TAG re: correspondance wiith class members.	SS	\$375	\$113
6/19/2015	0.1	Review correspondence from potential class member and forward to TAG.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/19/2015	0.3	Complete weekly update, organization, and review of case files; update case summary memorandum; correspond with potential class members.	TAG	\$285	\$86
6/22/2015	0.4	Discuss with TAG re: email correspondance with potential class members; review drafts of two motions to get ot JGB for edits.	SS	\$375	\$150
6/22/2015	0.3	Correspond with potential class members; update class member database and mailing list.	TAG	\$285	\$86
6/22/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/23/2015	0.7	Correspond with potential class members; discuss same with SS; enter phone note for call from potential class member.	TAG	\$285	\$200
6/24/2015	0.6	Return call from potential class member; enter phone note for same; update case summary memorandum.	TAG	\$285	\$171
6/25/2015	0.6	Correspond with potential class member; enter phone note for same.	TAG	\$285	\$171
6/26/2015	0.7	Correspond with potential class member; discuss same with SS; complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$285	\$200
6/26/2015	0.2	Discuss with TAG re: communication with potential class members.	SS	\$375	\$75
6/28/2015	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
6/28/2015	0.2	Review email exchange re: filtering potential class members' correspondance.	SS	\$375	\$75

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/29/2015	2.6	Correspond with potential class members; discuss same with SS; enter phone note for call with potential class member; update class member database and mailing list; send draft of motion for preliminary approval and motion for attorneys' fees to JGB for edits.	TAG	\$285	\$741
6/29/2015	0.1	Emails with TAG re: correspondence with potential class members and motion drafts for editing.	JGB	\$690	\$69
6/30/2015	0.4	Review edit to motion for preliminary approval.	SS	\$375	\$150
6/30/2015	0.7	Edit motion for preliminary approval.	JGB	\$690	\$483
6/30/2015	1.8	Monthly review of documents, filings, contacts, and other summary and general case information; correspond with potential class members; enter phone note for same; draft monthly update to potential class members; review JGB edits on motion; apply edits to motion; discuss same with SS.	TAG	\$285	\$513
7/1/2015	0.2	Edit monthly update language and discuss same with TAG.	SS	\$375	\$75
7/1/2015	1.3	Correspond with potential class members; discuss same with SS; review class certification order; update class member database and mailing list.	TAG	\$285	\$371
7/2/2015	0.3	Discuss with TAG re: correspondence with potential class members; email to case team re: upcoming deadlines and plan.	SS	\$375	\$113
7/2/2015	0.6	Complete weekly update, organization, and review of case files; update case summary memorandum; send PLAN email; send monthly update to potential class members; correspond with potential class member; enter phone note re: same.	TAG	\$285	\$171
7/5/2015	0.1	Review and give thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/6/2015	1.4	Correspond with potential class members; discuss same with SS; update class member database and mailing list.	TAG	\$285	\$399
7/6/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$460	\$0
7/7/2015	0.1	Discuss next steps with BLG.	MWS	\$490	\$0
7/8/2015	0.2	Correspond with potential class member; enter phone note for same.	TAG	\$285	\$57
7/9/2015	2.6	Apply edits to and draft motion for preliminary approval; discuss same with SS; correspond with potential class member.	TAG	\$285	\$741
7/9/2015	0.1	Review email from client and correspond with case team re: same.	JGB	\$690	\$69
7/9/2015	0.1	Email exchange with JGB regarding request for conference regarding questions/concerns Court may have regarding preliminary settlement.	JLN	\$570	\$57
7/10/2015	0.5	Review draft of motion for preliminary injunction; discuss same with TAG; discuss research with BLG re: judge's quotes on effect of insolvency on settlement.	SS	\$375	\$188
7/10/2015	3.4	Draft motion for preliminary approval; discuss same with SS and BLG; complete weekly update, organization, and review of case files.	TAG	\$285	\$969
7/10/2015	0.1	Correspond with case team re: joint letter to court.	JGB	\$690	\$69
7/10/2015	1.1	Edit motion for preliminary approval per JGB notes	BLG	\$290	\$319
7/13/2015	0.6	Email exchange with JGB and TAG re: letter requesting conference; edit same and discuss with TAG re: sending same to opposing counsel.	SS	\$375	\$225
7/13/2015	1.7	Draft correspondence to the court; discuss same with SS; correspond with potential class member; update class member database.	TAG	\$285	\$485

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/13/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/14/2015	0.9	Edit letter to the court re: requesting a conference; edit motion for preliminary approval.	JGB	\$690	\$621
7/14/2015	2.4	Apply JGB's edits to motion for preliminary approval; discuss same with SS; correspond with potential class members; discuss same with SS.	TAG	\$285	\$684
7/14/2015	1.3	Review JGB's edits; discuss same with TAG; email exchange with JLN re: letter to Court; discuss with TAG re: correspondence with potential class members.	SS	\$375	\$488
7/15/2015	0.3	Research commonality of defendants joining a motion for preliminary approval	BLG	\$290	\$87
7/15/2015	0.6	Apply edits to motion for preliminary approval.	TAG	\$285	\$171
7/15/2015	0.3	Email exchange with JGB re: letter to Court.	SS	\$375	\$113
7/16/2015	0.6	Correspond with potential class members; correspond with claims administrator; enter phone note for same; review emails between case team re: filing letter with court.	TAG	\$285	\$171
7/16/2015	0.2	Correspond with case team re: letter to the court; email case team re: correspondence with claims administrator.	JGB	\$690	\$138
7/16/2015	0.1	Discuss daily tasks with TAG.	JLM	\$460	\$0
7/17/2015	0.9	Email exchange with JGB and JLN re: communication with opposing counsel re: contacting court; discuss with TAG re: plan for following week and email case team re: same; edit motion for preliminary approval and discuss with TAG re: sending same to JGB.	SS	\$375	\$338
7/17/2015	2.3	Draft motion for preliminary approval; discuss same with SS; correspond with potential class member; update class member database.	TAG	\$285	\$656

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/17/2015	0.2	Correspond with case team re: communication with opposing counsel re: joint letter to the court.	JGB	\$690	\$138
7/17/2015	0.2	Telephone conference with defense counsel regarding possibility of submitting joint letter to Court requesting conference.	JLN	\$570	\$114
7/19/2015	2.1	Review and provide thoughts on case plan memorandum; review and edit proposed motion for preliminary approval; review and edit proposed motion for fees.	JGB	\$690	\$1,449
7/20/2015	0.4	Correspond with potential class member; update class member database.	TAG	\$285	\$114
7/20/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$460	\$0
7/20/2015	0.2	Review email exchange re: correspondence with potential class member.	SS	\$375	\$75
7/21/2015	0.2	Review emails exchanged between case team and opposing counsel re: submitting a joint letter to the court.	TAG	\$285	\$57
7/21/2015	0.4	Correspond with opposing counsel and case team re: submitting a joint letter to the court.	JGB	\$690	\$276
7/21/2015	0.2	Read e-mail exchanges between JGB and opposing counsel regarding request for conference and issue of amending prior settlement agreement to limit class size; email exchange with JGB regarding strategy of getting defendants to join in making application.	JLN	\$570	\$114
7/21/2015	0.8	Email exchange with opposing counsel and case team re: editing settlement agreement; review relevant provisions re: same.	SS	\$375	\$300
7/21/2015	0.1	Discuss next steps with TAG.	MWS	\$490	\$0
7/22/2015	0.5	Discuss next steps with SS; send motion for preliminary approval to JLN for comments; correspond with potential class members.	TAG	\$285	\$143

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/22/2015	0.4	Discuss with TAG re: sending copy of preliminary approval statement to JLN; review same.	SS	\$375	\$150
7/23/2015	0.8	Correspond with potential class members; enter phone notes for same.	TAG	\$285	\$228
7/24/2015	0.1	Correspond with case team re: contacting opposing counsel re: submitting a joint letter to the court.	JGB	\$690	\$69
7/24/2015	0.3	Complete weekly update, organization, and review of case files; update case summary memorandum; enter JLN's hours; review correspondence from potential class members.	TAG	\$285	\$86
7/24/2015	0.2	E-mail to JGB regarding status of defendant's response to our request for joint letter; telephone conference with opposing counsel regarding status of IJL's position on filing a joint letter; e-mail to JGB regarding same.	JLN	\$570	\$114
7/24/2015	0.3	Email case team re: next steps and deadlines; review email exchange with opposing counsel; discuss with TAG re: correspondence with class members.	SS	\$375	\$113
7/27/2015	0.2	Review and provide thoughts on case plan memorandum; email case team re: information provided by potential class member.	JGB	\$690	\$138
7/27/2015	1.2	Correspond with potential class members; discuss same with SS; update class member database; email case team re: information from potential class member.	TAG	\$285	\$342
7/27/2015	0.6	Discuss with TAG re: correspondence with potential class members; email exchange with JGB re: next steps; email exchange with JGB re: potential further fraud of New York franchises.	SS	\$375	\$225
7/28/2015	0.6	Correspond with potential class members.	TAG	\$285	\$171

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/28/2015	0.1	Email TAG re: correspondence with potential class members.	JGB	\$690	\$69
7/28/2015	0.5	Discuss with TAG re: correspondance with potential class members; review email exchange with opposing counsel; review JLN's email re: letter to Court.	SS	\$375	\$188
7/29/2015	0.1	Correspond with potential class members; discuss same with SS.	TAG	\$285	\$29
7/29/2015	0.1	Email exchange with case team re: discussing letter to the court.	JGB	\$690	\$69
7/29/2015	0.4	Discuss correspondence with potential class members with TAG, email exchange with JGB re: contacting court.	SS	\$375	\$150
7/30/2015	0.3	Correspond with potential class members; discuss same with SS; update class member database and mailing list.	TAG	\$285	\$86
7/30/2015	0.2	Email exchange with case team re: submitting letter to the court.	JGB	\$690	\$138
7/31/2015	1.2	Monthly review of documents, filings, contacts, and other summary and general case information; correspond with potential class member; discuss monthly update email with SS; draft and send monthly update email to potential class members; update case summary memorandum.	TAG	\$285	\$342
7/31/2015	0.2	Discuss with TAG re: next steps and email to case team re: same.	SS	\$375	\$75
8/3/2015	1.1	Correspond with potential class members; discuss same with SS; update class member database and mailing list; discuss next steps with TJF.	TAG	\$285	\$314
8/3/2015	0.2	Review and provide thoughts on case plan memorandum; correspond with case team and lead plaintiff re: timeline and settlement.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/3/2015	0.4	Discuss with TAG re: correspondance with potential class members; email exchange with class representative and discuss same with JGB.	SS	\$375	\$150
8/3/2015	0.2	Discuss status and next steps with TAG.	TJF	\$440	\$44
8/4/2015	0.4	Correspond with potential class members.	TAG	\$285	\$114
8/5/2015	1.4	Correspond with potential class members; update class member database and mailing list; email exchange with JGB re: writing letter to court.	TAG	\$285	\$399
8/5/2015	0.1	Correspond with case team re: writing letter to the court.	JGB	\$690	\$69
8/7/2015	0.1	Complete weekly update, organization, and review of case files.	TAG	\$285	\$29
8/10/2015	0.8	Correspond with potential class members; email exchange with JGB re: same; enter phone note for voicemail from potential class members; update class member database and mailing list.	TAG	\$285	\$228
8/10/2015	0.5	Review emails from potential class members and correspond re: same with TAG; correspond with MJN re: forwarding emails from inactive account.	JGB	\$690	\$345
8/11/2015	0.8	Correspond with potential class members; discuss same with SS.	TAG	\$285	\$228
8/11/2015	0.2	Discuss with TAG re: questions form potential class member.	SS	\$375	\$75
8/12/2015	0.4	Correspond with potential class members; enter phone note for same; review email from JGB re: issues for letter to court.	TAG	\$285	\$114
8/12/2015	0.1	Email case team re: issues for letter to the court.	JGB	\$690	\$69
8/13/2015	0.3	Correspond with potential class members; enter phone note for same.	TAG	\$285	\$86

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/14/2015	0.3	Complete weekly update, organization, and review of case files; enter phone note for correspondence with potential class member.	TAG	\$285	\$86
8/17/2015	1.6	Correspond with potential class members; enter phone notes for same; update potential class member database and mailing list.	TAG	\$285	\$456
8/18/2015	0.6	Correspond with potential class members; discuss same with SS; update potential class member database and mailing list.	TAG	\$285	\$171
8/18/2015	0.3	Discuss with TAG re: correspondance with potential class members.	SS	\$375	\$113
8/19/2015	1.3	Reviewed proposed letter to court; e-mailed TS re: need to review and edit same; revised and edited proposed letter to Court re: request for conference to address questions/concerns of Court re: parties' proposed settlement; email exchanges re: proposed letter; sent with redlined version to rest of team for review; email exchange with JGB re: deletion of middle paragraph of letter.	JLN	\$570	\$741
8/19/2015	1.2	Correspond with potential class members; enter phone notes for same; discuss same with SS; update mailing list; edit joint letter to the court; correspond with case team re: same.	TAG	\$285	\$342
8/19/2015	0.5	Correspond with case team re: joint letter to the court; review and provide thoughts on same.	JGB	\$690	\$345
8/20/2015	1.6	Correspond with potential class members; enter phone note for same; apply edits to joint letter to the court; send same to opposing counsel; discuss letter with case team; file same with the court; upload documents to case management system.	TAG	\$285	\$456
8/20/2015	0.5	Edit joint letter to Court; discuss same with JGB and TAG; supervising filing of same and review email exchange with opposing counsel re: same.	SS	\$375	\$188
8/20/2015	0.1	Line edit correspondence.	NMD	\$285	\$29

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/21/2015	0.4	Check judge's rules re: courtesy copies; correspond with potential class members; update potential class member database and mailing list; complete weekly update, organization, and review of case files.	TAG	\$285	\$114
8/24/2015	0.1	Reviewed Order granting joint request for conference; conference set for September 3; email exchanges re: same.	JLN	\$570	\$57
8/24/2015	0.7	Review order re: conference; discuss same with JGB and TAG; review email exchange with opposing counsel re: rescheduling; discuss with JGB and TAG re: argument memo and documents for JGB to bring to Court.	SS	\$375	\$263
8/24/2015	1.8	Correspond with case team and opposing counsel re: possible adjournment of conference with the court; correspond with potential class members; enter phone notes for same; update class member database and mailing list; check judge's rules re: adjournment requests; discuss same with SS.	TAG	\$285	\$513
8/24/2015	0.9	Correspond with case team and opposing counsel re: possible adjournment of conference with the court; lay out play for preparation for conference and coordination with co-counsel.	JGB	\$690	\$621
8/25/2015	3.4	Discuss motion for bringing electronic device into court with SS; call court re: same; enter phone note for call; draft argument memorandum for upcoming conference; discuss same and next steps with SS; upload documents to Dropbox; update case summary memorandum.	TAG	\$285	\$969
8/25/2015	0.3	Correspond with JLN re: meeting to discuss upcoming conference; correspond with case team re: argument prep	JGB	\$690	\$207
8/25/2015	0.1	Discuss next steps and pre-trial conference with TAG.	MWS	\$490	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/25/2015	0.7	Edit memorandum for appearance before Court re: settlement; discuss filing of request for electronic device.	SS	\$375	\$263
8/26/2015	0.2	Telephone call with JGB re: strategy for upcoming conference before Judge Stein on September 3.	JLN	\$570	\$114
8/26/2015	3.9	Call court re: electronic device order; enter phone note for same; discuss same with SS; update Dropbox; download files on JGB's iPad; correspond with MJN re: same; upload and sort documents in case management system; correspond with potential class members; run billing report and calculate attorney's fees; correspond with MJN and case team re: same; draft argument memorandum for upcoming conference; discuss same and next steps with SS.	TAG	\$285	\$1,112
8/26/2015	1.4	Correspond with case team re: next steps and preparation for upcoming conference; review most recent draft of preliminary settlement documents	JGB	\$690	\$966
8/26/2015	1.6	Edit memorandum with potential arguments for Court appearance; discuss same with JGB and TAG; discuss preparing documents for appearance; discuss with TAG re: submitting request for electronic devices.	SS	\$375	\$600
8/27/2015	1.1	Call chambers re: electronic device motion; enter phone note re: same; email same to judge's deputy; run report from case management system to create spreadsheet of attorney's fees.	TAG	\$285	\$314
8/28/2015	1.3	Calculate attorney's fees and email case team re: same; monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; send PLAN email; update court file binder.	TAG	\$285	\$371
8/28/2015	0.1	Discuss next steps with TAG.	MWS	\$490	\$49

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/28/2015	0.3	Review email exchange with TAG re: attorneys fees; discuss draft email re: plan and upcoming events.	SS	\$375	\$113
8/31/2015	0.2	Enter JLN's hours; upload document to case management system.	TAG	\$285	\$57
9/2/2015	2.2	Review settlement agreement; review and edit proposed brief in support of preliminary approval.	JGB	\$690	\$1,518
9/3/2015	2.6	Prepare for status conference; work through settlement terms with court at settlement conference; discuss with JLN updates to settlement agreement; review and update notes re changes to agreement; email case team re next steps.	JGB	\$690	\$1,794
9/4/2015	0.2	Email adversary and case team re plan for next steps.	JGB	\$690	\$138
9/6/2015	0.2	Review and give thoughts on case summary memorandum; email detailed thoughts to case team on settlement agreement updates.	JGB	\$690	\$138
9/7/2015	0.6	Update notes re: court conference and settlement agreement; email to case team	JGB	\$690	\$414
9/8/2015	2.4	Discuss conference and next steps with case team; correspond with potential class members; update class records and mailing list; apply edits to settlement agreement; discuss monthly update and next steps with SS; send updated settlement agreement to JLN.	TAG	\$285	\$684
9/8/2015	0.8	Discuss court conference and next steps with case team.	JGB	\$690	\$552
9/8/2015	0.3	Reviewed updated Settlement Agreement with Track Changes; took notes re: same.	JLN	\$570	\$171
9/8/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$460	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/8/2015	1.8	Meet with JGB and TAG re: outcome of conference and next steps; edits settlement agreement and discuss same with TAG; discuss update to potential class members with TAG.	SS	\$375	\$675
9/9/2015	2.3	Meet with JGB re: editing settlement agreement; review past drafts and correspondance and email opposing counsel re: various provisions; call with claim administrators re: editing notice.	SS	\$375	\$863
9/9/2015	1.7	Correspond with potential class members; update class records and mailing list; apply edits to motion for preliminary approval; take notes on phone call with claims administrator; enter phone note for same; discuss next steps with SS.	TAG	\$285	\$485
9/9/2015	0.1	Reviewed e-mail from SS to opposing counsel re: follow up for further clarification from IJL re: value of vouchers.	JLN	\$570	\$57
9/9/2015	0.2	Discuss status and next steps with TAG.	TJF	\$440	\$44
9/10/2015	2.7	Draft and send monthly update to potential class members; discuss same case team; correspond with potential class members and client; enter phone notes for same; update class records and mailing list; edit settlement agreement; email with case team re: same; discuss settlement agreement and notice with SS.	TAG	\$285	\$770
9/10/2015	1.2	Correspond with potential class member; email case team re: edits to settlement agreement and communication with client; review and edit draft monthly update.	JGB	\$690	\$828
9/10/2015	0.2	Reviewed e-mail from PS to opposing counsel responding to inquiry re: vouchers; reviewed e-mail from JGB to prospective class member/plaintiff.	JLN	\$570	\$114
9/10/2015	0.1	Discuss daily tasks with TAG.	JLM	\$460	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/11/2015	1.6	Complete weekly update, organization, and review of case files; draft short form notice; discuss same with SS; send same to JLN; draft plan email; correspond with potential class members; review information from claims administrator.	TAG	\$285	\$456
9/11/2015	0.3	Reviewed e-mail from opposing counsel providing further clarification on values of vouchers; reviewed e-mail from JGB to opposing counsel responding to clarification on vouchers; reviewed e-mail from opposing counsel re: liquidated damages provision and IJL's position re: same.	JLN	\$570	\$171
9/11/2015	1.6	Review and edit notice per judge's comments; discuss same with TAG and JGB; email exchange with opposing counsel re: particular settlement edits; discuss same with JGB; discuss with TAG re: correspondance with potential class members.	SS	\$375	\$600
9/13/2015	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
9/14/2015	2.7	Correspond with potential class members; enter phone note for same; take notes on SS call with plaintiff; enter phone note for same; discuss next steps with SS; discuss next steps and case status with JLM; research recycling of email address and email case team re: same; email JLN re: updated draft of short form notice.	TAG	\$285	\$770
9/14/2015	0.3	Correspond with case team re updated to settlement agreement and notice.	JGB	\$690	\$207
9/14/2015	1.2	Email exchange with JGB re: following up with opposing counsel about amended language in settlement agreement; discuss same with TAG; review email exchange with opposing counsel re: same; call with plainitt re: updates; discuss same with JGB; review email exchange with JLN re: short notice edits.	SS	\$375	\$450
9/14/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$460	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/15/2015	2.7	Correspond with potential class members; update class records; correspond with claims administrator; enter phone note for same; edit notices and settlement agreement; discuss same and next steps with SS.	TAG	\$285	\$770
9/15/2015	0.9	Review and provide edits on settlement agreement; email case team re: next steps; review notices; email case team.	JGB	\$690	\$621
9/15/2015	0.8	Reviewed revised Short Form Notice; compared with notes from Judge Stein Conf; made multiple edits and revisions; sent same to rest of team.	JLN	\$570	\$456
9/15/2015	0.1	Discuss next steps, fees, and long notice with TAG.	MWS	\$490	\$0
9/15/2015	1.4	Review JGB's edits to settlement agreement; discuss with JGB re: language to send to opposing counsel re: details of settlement; review and edit same; review JLN's comments to notice and email exchange with case team re: same.	SS	\$375	\$525
9/16/2015	4.4	Draft notices; discuss same with SS; correspond with claims administrator re: phone number; enter phone note for same; apply JGB's edits to settlement agreement; discuss same with SS; review emails between JGB and opposing counsel re: language in settlement agreement.	TAG	\$285	\$1,254
9/16/2015	0.3	Correspond with opposing counsel re: updated settlement agreement; email case team re: same and updated notices.	JGB	\$690	\$207
9/16/2015	1.1	Meet with JGB re: edits to settlement agreement; review and edit same; review email exchange with opposing counsel re: additional language about value of dates; discuss with TAG re: editing same.	SS	\$375	\$413
9/16/2015	0.2	Reviewed e-mail from JGB following up on various unsettled issues in proposed agreement; reviewed e-mail from JGB responding to my proposed changes in Short Form Notice.	JLN	\$570	\$114

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/17/2015	2	Calculate attorney's fees; edit proposed settlement agreement and discuss same with SS; upload and sort documents to case management system.	TAG	\$285	\$570
9/17/2015	0.2	Email to opposing counsel re: language to add to settlement agreement.	SS	\$375	\$75
9/17/2015	0.2	Reviewed further revisions to proposed settlement agreement, particularly injunctive relief sections; took notes re: same.	JLN	\$570	\$114
9/17/2015	0.1	Discuss daily tasks with TAG.	JLM	\$460	\$0
9/18/2015	0.4	Discuss with TAG re: plan and upcoming deadlines; review email to case team re: same; review email from opposing counsel re: settlement terms.	SS	\$375	\$150
9/18/2015	0.9	Complete weekly update, organization, and review of case files; update case summary memorandum; send updated notice drafts to JLN; calculate attorney's fees; draft and send plan email.	TAG	\$285	\$257
9/18/2015	0.3	Reviewed updated Notice (short and long form) drafts; took notes re: same.	JLN	\$570	\$171
9/18/2015	0.1	Discuss next steps and fees with TAG.	MWS	\$490	\$0
9/20/2015	0.2	Review proposed settlement language from adversary; email case team re incorporation of such language	JGB	\$690	\$138
9/21/2015	5.1	Calculate attorney's fees; draft settlement agreement and discuss same with SS; discuss notices with SS; email draft settlement agreement to opposing counsel; email case team re: attorney's fees; correspond with potential class members; update potential class member database and mailing list.	TAG	\$285	\$1,454

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/21/2015	0.9	Review and provide thoughts on case plan memorandum; review draft language for settlement agreement re: vouchers; email case team re: next steps; email exchange with adversary re settlement agreement terms	JGB	\$690	\$621
9/21/2015	0.8	Review and edit settlement agreement and notices; discuss same with TAG and JGB.	SS	\$375	\$300
9/21/2015	0.3	Reviewed emails between opposing counsel and JGB regarding vouchers and possibly getting Judge Stein involved.	JLN	\$605	\$182
9/21/2015	0.1	Discuss next steps and updated settlement agreement with TAG.	MWS	\$490	\$0
9/22/2015	0.2	Correspond with potential class members; discuss attorney's fees and daily tasks with MWS.	TAG	\$285	\$57
9/23/2015	0.3	Enter JLN's hours and correspond with Nicole re: same; correspond with potential class member.	TAG	\$285	\$86
9/23/2015	0.1	Discuss next steps and fees with TAG.	MWS	\$490	\$0
9/24/2015	2.6	Calculate attorney's fees; discuss same with MJN; discuss daily tasks with JMS; correspond with potential class members.	TAG	\$285	\$741
9/24/2015	0.1	Reviewed case status with TAG and discussed upcoming deadlines	JMS	\$470	\$0
9/25/2015	1.4	Calculate attorney's fees; discuss same and next steps with SS; email case team re: attorney's fees; draft and send PLAN email; complete weekly update, organization, and review of case files.	TAG	\$285	\$399
9/25/2015	0.2	Email case team re: fees, draft settlement agreement, and meeting to discuss.	JGB	\$690	\$138
9/25/2015	0.6	Review opposing counsel's email re: edits; discuss same with TAG; email to opposing counsel re: same; discuss with JGB re: meeting to edit agreement.	SS	\$375	\$225

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/25/2015	0.2	Reviewed emails between TAG and opposing counsel regarding draft of the proposed settlement agreement.	JLN	\$605	\$121
9/28/2015	0.5	Discuss settlement agreement and next steps with case team; review and make notes on new proposed agreement.	JGB	\$690	\$345
9/28/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$460	\$0
9/28/2015	1.8	Enter phone note for voicemail from potential class members; meet with case team to discuss settlement agreement and next steps; edit settlement agreement; draft email to opposing counsel; discuss settlement agreement edits and next steps with SS.	TAG	\$285	\$513
9/29/2015	0.9	Take notes on phone call with opposing counsel; enter phone note for same; correspond with potential class member; enter phone note for same.	TAG	\$285	\$257
9/29/2015	0.5	Email exchange with case team re: call with opposing counsel; discuss same with SS.	JGB	\$690	\$345
9/29/2015	0.3	Emails between SS and opposing counsel regarding points from clients re: the draft of the proposed settlement agreement.	JLN	\$605	\$182
9/29/2015	1.3	Discuss with JGB re: call to opposing counsel; discuss same with TAG and prepare for same; call to opposing counsel re: settlement; review settlement agreement re: same and outline potential compromise in accordance with Judge's comments.	SS	\$375	\$488
9/30/2015	1.1	Draft letter to the court; correspond with opposing counsel and case team re: same; file letter with the Court; discuss same and next steps with SS; upload and sort documents in case management system.	TAG	\$285	\$314
9/30/2015	0.2	Review and provide thoughts on status update letter to the court.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/30/2015	0.3	Reviewed letter from JGB to Judge Stein re: update on proposed settlement agreement; reviewed TAG and opposing counsel draft of a letter updating the Court; reviewed letter TAG and opposing counsel filed with court today.	JLN	\$605	\$182
9/30/2015	0.5	Discuss call with opposing counsel and drafting letter to Court with JGB; discuss same with TAG; edit letter to Court re: settlement update; discuss with TAG re: next steps.	SS	\$375	\$188
10/1/2015	0.2	Draft monthly update to potential class members.	TAG	\$285	\$57
10/1/2015	0.1	Reviewed upcoming case tasks with TAG.	JMS	\$495	\$0
10/1/2015	0.2	Review most recent correspondence re: settlement; review settlement agreement	JGB	\$690	\$138
10/2/2015	0.4	Email exchange with TAG re: plan email; review email re: changes to settlement agreement from opposing counsel; review email from TAG re: request from Oregon DOJ.	SS	\$405	\$162
10/2/2015	0.2	Review and provide thoughts on monthly update email language.	JGB	\$690	\$138
10/2/2015	0.3	Reviewed e-mail exchanges between JGB and opposing counsel regarding settlement agreement and opposing counsel's position re: vouchers.	JLN	\$605	\$182
10/2/2015	2.1	Update court file binder; complete weekly update, organization, and review of case files; correspond with potential class members; enter phone notes for same; draft and send plan email; update case summary memorandum; respond to inquiry from Oregon Department of Justice.	TAG	\$285	\$599
10/5/2015	0.1	Review JGB's thoughts on case plan.	SS	\$405	\$41
10/6/2015	0.1	Corresponded with potential class members.	TAG	\$285	\$29

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/7/2015	0.6	Correspond with potential class member; enter phone note for same; review settlement agreement with Defendants' comments; send PDF of same to JGB; upload and sort document to case management system.	TAG	\$285	\$171
10/7/2015	0.2	Review emails between case team re: draft settlement agreement.	SS	\$405	\$81
10/7/2015	0.1	Email opposing counsel re: settlement agreement draft; email case team re: same.	JGB	\$690	\$69
10/8/2015	0.7	Correspond with potential class members; update class member database and mailing list; email exchange with JGB re: communications.	TAG	\$285	\$200
10/8/2015	0.1	Discussed upcoming case tasks and next steps with TAG.	JMS	\$495	\$0
10/8/2015	0.1	Email TAG re: plan email.	SS	\$405	\$41
10/8/2015	0.1	Advise TAG re: potential class member communications.	JGB	\$690	\$69
10/9/2015	0.2	Complete weekly update, organization, and review of case files; send plan email.	TAG	\$285	\$57
10/13/2015	0.6	Take notes on phone call with opposing counsel; enter phone note for same; discuss settlement agreement, phone call, and next steps with SS.	TAG	\$285	\$171
10/13/2015	0.6	Call with opposing counsel re: settlement; discuss same with TAG; review JGB's email exchange with Court re: same; discuss same with JGB.	SS	\$405	\$243
10/14/2015	0.2	Email case team re: correspondence with potential class member and sending drafts to opposing counsel; follow up with case team on next ste.	JGB	\$690	\$138
10/14/2015	0.4	Review short notice; email to JGB re: discussing same.	SS	\$405	\$162

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/14/2015	0.7	Update draft of settlement agreement; email draft agreement and notice to opposing counsel; discuss same and next steps with SS; correspond with potential class member; discuss same with SS.	TAG	\$285	\$200
10/15/2015	1.2	Correspond with Ariel Dreher from Oregon DOJ; take notes on phone call with same; enter phone note for same; correspond with potential class members.	TAG	\$285	\$342
10/15/2015	0.9	Email exchange with Oregon attorney general's office re: our case; call re: same; discuss same with TAG; discuss correspondence with potential class members re: same.	SS	\$405	\$365
10/16/2015	1.4	Draft plan email; send draft notice to opposing counsel; discuss same with SS; send updated draft agreement and notices to class representatives; discuss same with SS; take notes on and enter phone note for SS call with opposing counsel.	TAG	\$285	\$399
10/16/2015	0.2	Discuss update to class representatives with SS; discuss status of court update with SS.	JGB	\$690	\$138
10/16/2015	1.8	Review settlement agreement and notices and discuss edits to same with TAG; call to opposing counsel re: same; discuss call with JGB; email to Court re: timing of settlement agreement; draft email language to send to class members and discuss same with JGB and TAG.	SS	\$405	\$729
10/19/2015	0.6	Upload documents to case management system; discuss settlement agreement, correspondence with opposing counsel and next steps with SS.	TAG	\$285	\$171
10/19/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/19/2015	1.2	Email exchange with opposing counsel re: final edits to settlement agreement; review version received from opposing counsel and edit as agreed; meet with JGB to discuss same; discuss submitting same with TAG.	SS	\$405	\$486

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/19/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
10/20/2015	1.9	Submit updated proposed settlement agreement and notices to the court; discuss same with SS; call court clerk re: same; enter phone note for same; search firm email database and case management system for information re: government entities and confidentiality agreements; discuss same with SS.	TAG	\$285	\$542
10/20/2015	1.2	Supervise submission of settlement agreement to Court; edit language re: same; discuss with TAG re: prior contacts with government agencies and review correspondence re: same.	SS	\$405	\$486
10/21/2015	0.9	Correspond with potential class members; enter phone notes for same; discuss same with SS.	TAG	\$285	\$257
10/21/2015	0.2	Discuss with TAG re: correspondence with defendant's employee.	SS	\$405	\$81
10/22/2015	0.3	Correspond with potential class members; enter phone note for same.	TAG	\$285	\$86
10/23/2015	0.7	Complete weekly update, organization, and review of case files; draft plan email; correspond with potential class members; update class member database and mailing list.	TAG	\$285	\$200
10/23/2015	0.1	Review TAG's email re: plan.	SS	\$405	\$41
10/26/2015	0.4	Correspond with potential class members; discuss same with SS; update class member database and mailing list.	TAG	\$285	\$114
10/27/2015	0.4	Discuss with TAG re: correspondence with potential class members; review emails re: same; discuss contacting Court of no news and updating calendar accordingly.	SS	\$405	\$162

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/27/2015	0.4	Correspond with potential class member; enter phone note for same; discuss same with SS; discuss contacting court with SS and create calendar entries re: same.	TAG	\$285	\$114
10/29/2015	0.2	Discuss with TAG re: correspondance with class members.	SS	\$405	\$81
10/29/2015	0.2	Correspond with potential class member; discuss same with SS; update class member database.	TAG	\$285	\$57
10/30/2015	1.6	Monthly review of documents, filings, contacts, and other summary and general case information; correspond with potential class member; update mailing list; discuss correspondence with plaintiff with SS; review and collect previous correspondence for same.	TAG	\$285	\$456
10/30/2015	0.8	Review emails from iniital correspondance with plaintiffs re: service award; review email from plaintiff re: same and respond to same copying previous correspondance; discuss same with TAG and JGB.	SS	\$405	\$324
11/2/2015	0.3	Correspond with potential class member; draft monthly update; discuss with SS response to inquiry.	TAG	\$285	\$86
11/4/2015	0.6	Discuss with TAG re: reaching out to counsel representing potential class member; review emails re: same; exchange emails with TAG re: same and how to address various questions; edit monthly update language to class members and discuss same with TAG.	SS	\$405	\$243
11/4/2015	0.7	Correspond with California firm re: the class action; enter phone note for same; discuss same and monthly update with SS; prepare monthly update for sending; email MJN re: MailChimp issue.	TAG	\$285	\$200
11/5/2015	0.4	Send monthly update; correspond with potential class members; update class member mailing list and database.	TAG	\$285	\$114

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/5/2015	0.3	Review monthly update; discuss with TAG re: correspondance with potential class members.	SS	\$405	\$122
11/5/2015	0.1	Reviewed upcoming case tasks with TAG.	JMS	\$495	\$0
11/6/2015	0.3	Draft and send plan email; discuss same with SS; correspond with potential class member.	TAG	\$285	\$86
11/9/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
11/9/2015	0.4	Discuss drafting letter to court with SS; update case summary memorandum; correspond with potential class member.	TAG	\$285	\$114
11/10/2015	0.1	Discuss next steps and letter to court with TAG.	MWS	\$515	\$0
11/10/2015	0.3	Correspond with potential class members; discuss same with SS; update class member database.	TAG	\$285	\$86
11/11/2015	0.1	Discuss status and next steps with TAG.	TJF	\$465	\$0
11/11/2015	0.8	Draft letter to the court; discuss same with SS and JGB; correspond with opposing counsel re: same.	TAG	\$285	\$228
11/11/2015	0.1	Line edit letter to Judge Stein.	MMH	\$295	\$30
11/12/2015	1.1	File letter with the court; correspond with former employee of defendant; discuss same with SS.	TAG	\$285	\$314
11/12/2015	0.1	Reviewed joint letter motion requesting another conference before Judge Stein to address proposed settlement agreement.	JLN	\$605	\$61
11/12/2015	0.6	Discuss filing of letter with TAG; supervise filing of same; review correspondance with opposing counsel; discuss correspondance with IJL employees with TAG and schedule call re: same.	SS	\$405	\$243
11/13/2015	0.6	Complete weekly update, organization, and review of case files; draft and send plan email; discuss same with SS; discuss correspondence with former IJL employee with SS; create event entries for conference with the court.	TAG	\$285	\$171

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/13/2015	0.4	Correspond with the court re: scheduling a conference; discuss prep for conference with SS.	JGB	\$690	\$276
11/13/2015	0.4	Review email exchange with Court re:conference; discuss with TAG re: next steps; email case team re: next steps and plan.	SS	\$405	\$162
11/14/2015	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
11/16/2015	2.4	Prepare for upcoming conference; upload documents to and fix formatting of same in Dropbox; take notes on and enter phone note for call with potential class member.	TAG	\$285	\$684
11/16/2015	0.1	Reviewed Order for bringing in electronic devices to Court.	JLN	\$605	\$61
11/16/2015	0.6	Review JGB's email re: plan; review order re: electronic devices; call to potentially former employee of defendants with TAG; discuss same with TAG.	SS	\$405	\$243
11/16/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
11/17/2015	0.7	Correspond with potential class member; enter phone note for same; update mailing list; email opposing counsel to arrange phone call; discuss same and preparation for conference with SS.	TAG	\$285	\$200
11/17/2015	0.3	Review materials in anticipation of court conference.	JGB	\$690	\$207
11/17/2015	0.3	Discuss with TAG re: call with opposing counsel and preparing for hearing; email exchange with opposing counsel re: call.	SS	\$405	\$122
11/18/2015	0.4	Take notes on call with opposing counsel; discuss upcoming conference with case team.	TAG	\$285	\$114
11/18/2015	0.3	Discuss upcoming conference and preparation for same with case team; phone call with opposing counsel re: same.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/18/2015	2.8	Reviewed prior submissions to court re: proposed settlement agreement; reviewed amendments to same and notes from prior conference before Judge Stein; prepared bullet point summary of same for tomorrow's conference.	JLN	\$605	\$1,694
11/18/2015	0.4	Call with opposing counsel re: preparing for conference; discuss preparation for hearing with JGB.	SS	\$405	\$162
11/19/2015	4.3	Correspond with potential class members; enter phone notes for same; discuss same with SS; update mailing list; take notes on call with claims administrator and enter phone note for same; prepare copies of documents for conference; attend and take notes in conference; discuss next steps with case team; create events entries in firm calendar and case management system; upload documents to case management system.	TAG	\$285	\$1,226
11/19/2015	2.1	Advocate for class at conference re: settlement agreements; discuss next steps with case team.	JGB	\$690	\$1,449
11/19/2015	0.1	Reviewed upcoming case tasks with TAG.	JMS	\$495	\$0
11/19/2015	1.5	Attended status conference before Judge Stein re: proposed settlement agreement and concerns/issues of Judge Stein re: same; meeting with team following today's conference to discuss issues raised by Judge Stein and next steps for moving forward.	JLN	\$605	\$908
11/19/2015	4.6	Prepare for hearing; discuss correspondance with potential class members with TAG; call to claim administrators re: being available during hearing and email exchange re: same; discuss general preparation with JGB; attend hearing and discuss result of same with case team.	SS	\$405	\$1,863

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/20/2015	1.2	Complete weekly update, organization, and review of case files; upload documents to case management system; draft and send plan email; discuss same with SS; discuss next steps and revising settlement documents with case team.	TAG	\$285	\$342
11/20/2015	0.4	Discuss next steps and revising settlement documents with case team.	JGB	\$690	\$276
11/20/2015	0.8	Discuss next events and plan email with TAG; meet with case team re: same; edit plan email; discuss with TAG re: correspondance with potential class members.	SS	\$405	\$324
11/20/2015	0.1	Reviewed Order issued following yesterday's conference and setting next conference date and filing dates.	JLN	\$605	\$61
11/22/2015	0.1	Review and give thoughts on case summary memorandum	JGB	\$690	\$69
11/24/2015	0.2	Discuss with TAG re: correspondance with potential class members.	SS	\$405	\$81
11/24/2015	0.2	Correspond with potential class members; discuss same with SS.	TAG	\$285	\$57
11/25/2015	0.5	Discuss with TAG re: correspondance with former employee of defendants and potential class members; email exchange with opposing counsel re: editing settlement agreement.	SS	\$405	\$203
11/25/2015	0.5	Complete weekly update, organization, and review of case files; correspond with potential class members; discuss same with SS; upload new clean versions of settlement documents for editing to case management system.	TAG	\$285	\$143
11/25/2015	0.2	Email case team re: plan for next week; discuss with case team	JGB	\$690	\$138
11/25/2015	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/28/2015	1.2	Review most up to date settlement and notice docs; edit settlement docs; lay out updated plan to case team	JGB	\$690	\$828
11/29/2015	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
11/30/2015	1.6	Monthly review of documents, filings, contacts, and other summary and general case information; correspond with potential class member; update class member database and mailing list; draft monthly update; correspond with former employee of defendant and enter phone note for same; discuss same with SS; upload documents to case management system; apply JGB's edits to proposed settlement agreement; discuss same and further edits and plan with SS.	TAG	\$285	\$456
11/30/2015	0.7	Call to former employee of defendants; discuss same with TAG; review JGB's edits to settlement agreement; call with JGB re: same.	SS	\$405	\$284
11/30/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
12/1/2015	1.6	Correspond with potential class members; update class member database and mailing list; correspond with former employee of defendant and discuss same with SS; revise settlement documents; discuss same with SS.	TAG	\$285	\$456
12/1/2015	1	Call to defendants' former employee and discuss same with TAG; review revisions to settlement documents; discuss same with TAG.	SS	\$405	\$405
12/2/2015	3.2	Revise settlement agreement and class notices; discuss same with SS; correspond with potential class member; enter phone note for same; draft and send monthly update to potential class members; discuss same with SS.	TAG	\$285	\$912
12/2/2015	4.4	Research calculation attorneys' fees on injunctive relief; research coupon vs. voucher distinction	BLG	\$290	\$1,276

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/2/2015	0.2	Drafted e-mail to team re: following up on which national publication notice will be published in, voucher value (1 date v. 2) and proposed meeting with opposing counsel in person to work out details.	JLN	\$605	\$121
12/2/2015	3.4	Meet with TAG re: edits to settlement agreement and revising same; email exchange with JN re: next steps and how to proceed; discuss same with JGB; review monthly update language and revise same; discuss with TAG re: correspondance with potential class members; meet with BLG re: various research re: valuation of injunctive relief and distinction between coupon and voucher settlement.	SS	\$405	\$1,377
12/3/2015	1.1	Discuss settlement document revisions with SS; draft list of same revisions needed to comply with court's instructions; correspond with potential class member and enter phone note for same.	TAG	\$285	\$314
12/3/2015	0.8	Review notes from conference and email opposing counsel re: outstanding issues; discuss same with TAG; discuss correspondance with potential class members with TAG.	SS	\$405	\$324
12/4/2015	0.3	Complete weekly update, organization, and review of case files; draft and send plan email.	TAG	\$285	\$86
12/7/2015	1.7	Edit and draft letter to the court re: document revisions; discuss same with TAG; call with opposing counsel re: settlement; discuss next steps with TAG; review notes from previous conference re: changes to next draft of agreement.	SS	\$405	\$689
12/7/2015	1.2	Draft letter to the court re: document revisions; discuss same with SS; take notes on phone call with opposing counsel; enter phone note for same; discuss next steps with SS.	TAG	\$285	\$342
12/7/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/8/2015	3.1	Edit cover letter to court re: settlement changes; discuss same with TAG and JGB; make revisions to settlement agreement; review TAG's revisions and discuss same with TAG; email exchange with opposing counsel re: same; discuss with TAG re: correspondence with potential class members.	SS	\$405	\$1,256
12/8/2015	0.3	Reviewed draft cover letter to court explaining substantive changes to proposed settlement agreement; provided feedback to team re: same.	JLN	\$605	\$182
12/8/2015	0.1	Discuss next steps and settlement with TAG.	MWS	\$515	\$0
12/8/2015	0.2	Line edit letter to the Court.	MMH	\$295	\$59
12/9/2015	0.8	Review and provide edits on letter to the court; email case team re: correspondence with opposing counsel.	JGB	\$690	\$552
12/9/2015	4.3	Discuss with TAG re: correspondence with class members; discuss with JGB re: changes to letter to Court; review edits and discuss with TAG re: inserting same; email exchange with opposing counsel re: new terms and edits to documents; email exchange with JLN re: same; discuss adjournment with opposing counsel and language to Court re: same.	SS	\$405	\$1,742
12/9/2015	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
12/9/2015	4.9	Correspond with potential class members; enter phone notes for same; update class member database and mailing list; apply edits to cover letter to the Court; discuss same with SS; calculate attorney's fees and expenses; discuss same with SS; draft timeline for settlement to submit to the Court.	TAG	\$285	\$1,397

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/9/2015	3.5	Draft cover letter to the court; discuss same with SS; make revisions to settlement agreement and discuss same with SS; send same and revised settlement agreement to opposing counsel; correspond with potential class members; enter phone note for same; update class member database and mailing list.	TAG	\$285	\$998
12/10/2015	2.3	Draft proposed scheduling order; discuss same with SS; correspond with potential class members; edit proposed settlement agreement and notices; send documents to JGB for review.	TAG	\$285	\$656
12/10/2015	0.3	Discuss settlement docs with SS; email Court re: deadline extension.	JGB	\$690	\$207
12/10/2015	1.8	Review and edit draft proposed scheduling order; discuss same with TAG; discuss with TAG re: correspondance with potential class members; edit proposed settlement agreement and notices; email to opposing counsel re: status of edits; disucss with JGB re: his edits to documents and review email exchange re: same.	SS	\$405	\$729
12/10/2015	0.2	Line edit proposed scheduling order.	MMH	\$295	\$59
12/11/2015	4.3	Email exchange with opposing counsel re: edits; edit letter re: changes made in settlement agreement and discuss same with TAG; discuss same with JGB; review edits to settlement agreement and other documents; discuss same with opposing counsel; review emails from JLN re: same; supervise mailing of all documents to Court.	SS	\$405	\$1,742
12/11/2015	1.1	Review and edit letter to the court, proposed settlement agreement, and proposed scheduling order; email case team re: same, next steps, and opposing counsel's edits to documents.	JGB	\$690	\$759

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/11/2015	5.6	Complete weekly update, organization, and review of case files; update case summary memorandum; revise and apply edits to settlement documents, proposed scheduling order, and letter to the Court; discuss same with SS; correspond with opposing counsel re: same; complete and submit electronic device order form to courtroom deputy; draft and send plan email to case team;	TAG	\$285	\$1,596
12/14/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
12/14/2015	0.3	Reviewed order re: bringing devices to court; drafted e-mail to team re: value of vouchers and voucher chart not in cover letter to court, recommend supp. letter to court.	JLN	\$605	\$182
12/14/2015	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$50
12/14/2015	0.7	Correspond with potential class members; discuss prep for conference with SS; prep for conference.	TAG	\$285	\$200
12/15/2015	2.4	Review edits to notices and discuss same with JGB and TAG; email exchange with opposing counsel re: conference; case meeting re: conference and preparing documents for hearing; email to case team re: meeting agenda; supervise physical copies delivery and discuss same with TAG.	SS	\$405	\$972
12/15/2015	1.6	Discuss conference and next steps with case team; review recent submissions and prepare for court conference.	JGB	\$690	\$1,104
12/15/2015	0.8	Deliver courtesy copies to court.	NMD	\$285	\$228
12/15/2015	0.1	Line edit letter to opposing counsel.	MMH	\$295	\$30

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/15/2015	5.2	Prepare documents and laptop for conference; discuss same with SS; upload documents to Dropbox in advance of conference; discuss conference and next steps with case team; draft agenda for moot with case team; revise notices and send same to opposing counsel; discuss same with SS.	TAG	\$285	\$1,482
12/15/2015	0.1	Discuss next steps and prep for court conference with TAG.	MWS	\$515	\$0
12/16/2015	4.2	Prepare for hearing and discuss same with TAG and JGB; edit notices per opposing counsel's email; discuss edits with TAG; attend hearing and discuss remaining issues with opposing counsel and case team; edit and draft next steps and plan email to case team.	SS	\$405	\$1,701
12/16/2015	3.2	Prepare for status conference; attend and take notes on status conference; revise short-form notice; draft detailed plan email and discuss with SS; discuss next steps with SS; create and edit events entries in firm calendar and case management system; upload documents to case management system.	TAG	\$285	\$912
12/16/2015	1.8	Prepare for status conference; advocate for clients and class at status conference; discuss next steps with case team.	JGB	\$690	\$1,242
12/16/2015	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
12/16/2015	1.8	Reviewed court order permitting plaintiffs to move for preliminary approval of settlement agreement and release of claims on or before January 8, 2016; Attended conference before Judge Stein addressing additional concerns and questions for Court re: proposed settlement agreement; post-conference meeting with team to discuss Judge Stein's concerns and recommendations, and next steps for moving forward.	JLN	\$605	\$1,089

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/17/2015	1.8	Correspond with potential class members; enter phone notes for same; update mailing list; edit motion for preliminary approval; email portions of same to JGB for review; discuss same with SS.	TAG	\$285	\$513
12/17/2015	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
12/17/2015	1.3	Edit motion for preliminary approval; discuss same and email to JGB with TAG; call with claim administrators re: next steps.	SS	\$405	\$527
12/17/2015	0.1	Reviewed upcoming case tasks with TAG	JMS	\$495	\$0
12/18/2015	1.8	Complete weekly update, organization, and review of case files; review case team's notes from conference; revise settlement agreement and notices; discuss same with SS.	TAG	\$285	\$513
12/18/2015	1.3	Edit and review revised settlement agreement and notices; discuss same with TAG; edit motion for preliminary approval; email exchange with claim administrators re: next steps and publication; review material received from claim administrators; calls re: same.	SS	\$405	\$527
12/21/2015	6.1	Draft motion for preliminary approval; discuss same with SS; send short-form notice to claims administrator; discuss same with SS; discuss upcoming monthly update with SS; email case team re: attorney's fees and discuss same with SS; correspond with potential class members; correspond with JLN re: hours; upload documents to case management systems; review SDNY and judge's local rules re: length of briefs; edit settlement agreement and notices and email same to case team; discuss same with SS; review records of potential class members.	TAG	\$285	\$1,739
12/21/2015	0.1	Email exchange with case team re: attorney's fees.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/21/2015	5.4	Edit motion for preliminary approval; discuss same with TAG and JGB; call and email exchange with claim administrator re: short-form notice; discuss sending same with TAG; discuss upcoming monthly update with TAG; review email to case team re: attorney's fees and discuss same with TAG; review emails re: billing and discuss same with TAG.	SS	\$405	\$2,187
12/21/2015	0.2	Located e-mail prior correspondence with Conn. AG's office (N. Ayala) and forwarded same to SS.	JLN	\$605	\$121
12/22/2015	3.8	Draft motion for preliminary approval; discuss same with SS; calculate attorney's fees; correspond with claims administrator and send documents to same; prepare and send settlement documents to opposing counsel; review correspondence with attorneys general and email SS re: same; apply JGB's edits to motion for preliminary approval and discuss same with SS; draft letter notice for CAFA and email same to opposing counsel.	TAG	\$285	\$1,083
12/22/2015	1.4	Review and provide edits on motion for preliminary approval; email case team re: sending revised settlement documents to opposing counsel.	JGB	\$690	\$966
12/22/2015	3.1	Call to Connecticut attorney general and leave message; review prior correspondance with same officel; edit motion for preliminary approval; discuss same with TAG; discuss attorney's fees with TAG and claculation of same; correspond with claims administrator and discuss with TAG re: sending documents to same; edit CAFA letter and discuss same with TAG; email to opposing counsel re: same.	SS	\$405	\$1,256
12/23/2015	0.8	Review and edit motion for preliminary approval.	JGB	\$690	\$552

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/23/2015	2.6	Call to attorney general re: settlement agreement; edit motion for preliminary approval; discuss same with TAG; discuss drafting affidavits for class representatives with TAG; discuss monthly update with TAG; review draft plan email and discuss next steps with TAG..	SS	\$405	\$1,053
12/23/2015	2.1	Draft motion for preliminary approval; discuss same with SS; discuss drafting affidavits for class representatives with SS; draft notice of motion for motion for preliminary approval; calculate attorney's fees; discuss monthly update with SS; draft plan email; discuss next steps with SS.	TAG	\$285	\$599
12/23/2015	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
12/24/2015	0.1	Email case team re next steps with settlement.	JGB	\$690	\$69
12/24/2015	2.3	Email to opposing counsel re: status of feedback and affidavit re: financial state; discuss with NMD re: setting up affidavits structure; edit motion for preliminary approval; email to class representatives re: status and draft of settlement agreement; email exchange with class representative re: service award provision; discuss same with JGB.	SS	\$405	\$932
12/24/2015	0.9	Draft affidavits; edit brief for proposed settlement; correspond with case team regarding the same.	NMD	\$285	\$257
12/29/2015	0.3	Email exchange with adverse counsel and case team re upcoming filings for court including statement on IJL finances.	JGB	\$690	\$207
12/29/2015	0.5	Email exchange with opposing counsel re: preliminary approval motion; email exchange with JGB re: same; email exchange with Connecticut attorney general re: same.	SS	\$405	\$203

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/30/2015	1.1	Review emails between case team and opposing counsel; review emails between case team and attorney general's office; email SS re: call with attorney general; monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; correspond with potential class members; update class member database.	TAG	\$285	\$314
12/30/2015	0.2	Revise email to case team re: next steps and plan and send same.	SS	\$405	\$81
12/31/2015	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
1/4/2016	4.4	Draft affidavits for named plaintiffs; discuss same with SS and send same to JGB for review; apply JGB's edits to affidavits and send same to plaintiffs; draft emails re: same to plaintiffs; apply JGB's edits to motion for preliminary approval; discuss same with SS; draft declaration in support of motion for preliminary approval; correspond with potential class members; send monthly update email to potential class members; discuss same with SS and JGB; meet with case team to discuss next steps.	TAG	\$285	\$1,254
1/4/2016	1.8	Edit motion for preliminary approval; discuss motion for preliminary approval and next steps with case team; review and edit named plaintiff affidavits; review and provide thoughts on monthly update draft language.	JGB	\$690	\$1,242
1/4/2016	0.1	Perform line edit of affidavits.	NMG	\$285	\$29
1/4/2016	4.2	Edit affidavits for named plaintiffs; discuss same with TAG and JGB; review JGB's edits to affidavits and emails re: same to plaintiffs; review JGB's edits to motion for preliminary approval; discuss same with TAG; edit same; discuss with TAG re: correspondence with potential class members; draft monthly update email to potential class members; discuss same with TAG and JGB; meet with case team to discuss next steps.	SS	\$405	\$1,701

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/5/2016	5.6	Correspond with potential class members; update class member database; take notes on phone calls with government offices; enter phone notes for same; discuss same with SS; draft email to opposing counsel re: his edits to settlement documents; draft motion for preliminary approval; revise settlement agreement and notices; email affidavits to named plaintiffs; correspond with case team re: same; email Oregon assistant attorney general re: phone call with SS; discuss next steps and motion for preliminary approval with SS; review opposing counsel's edits to settlement documents and discuss same with SS.	TAG	\$285	\$1,596
1/5/2016	0.4	Email case team re: named plaintiff affidavits, opposing counsel's edits, and next steps.	JGB	\$690	\$276
1/5/2016	5.8	Discuss with TAG re: correspondence with potential class members; call with attorney generals' offices and email exchange re: same; discuss same with TAG; email exchange with opposing counsel re: edits; discuss same with TAG; email to case team re: opposing counsel's comments; edit motion for preliminary approval; discuss next steps and motion for preliminary approval with TAG; edit settlement documents.	SS	\$405	\$2,349
1/6/2016	0.9	Correspond with potential class members; update class member database; apply JGB's edits to motion for preliminary approval; correspond with named plaintiffs and case team re: affidavits; format and upload affidavits to case management system; review JLN's edits to motion for preliminary approval.	TAG	\$285	\$257
1/6/2016	1.5	Review and edit motion for preliminary approval; email case team re: same; correspond with named plaintiffs re: affidavits.	JGB	\$690	\$1,035

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/6/2016	2.2	Reviewed draft motion for preliminary approval of settlement agreement and all attachments; made notes re: proposed changes/edits to same; sent e-mail to team re: proposed edits/suggestions for our motion; e-mail response from JGB to my proposed changes/edits.	JLN	\$605	\$1,331
1/6/2016	2.8	Correspond with potential class members and discuss same with TAG; review JGB's edits to motion for preliminary approval and discuss same with TAG; correspond with named plaintiffs and case team re: affidavits; review same; review JLN's edits to motion for preliminary approval and discuss same with JGB; edit motion for preliminary approval; review updated authority for motion for preliminary approval and motion for fees.	SS	\$405	\$1,134
1/6/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
1/7/2016	0.4	Correspond with potential class member and email TAG re: same; correspond with opposing counsel and email case team same.	JGB	\$690	\$276
1/7/2016	1.8	Revise settlement agreement and notices; correspond with potential class members; update class member database; draft motion for preliminary approval; discuss same with SS.	TAG	\$285	\$513
1/7/2016	0.1	E-mail exchange between JGB and opposing counsel re: writing to court for extension of tomorrow's deadline for filing motion.	JLN	\$605	\$61
1/7/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
1/7/2016	1.7	Review revisions to settlement documents; discuss with TAG re: correspondence with potential class members; review emails from claim administrators; discuss edits to motion for preliminary injunction with TAG same with SS; edit same.	SS	\$405	\$689

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/8/2016	2.4	Complete weekly update, organization, and review of case files; update case summary memorandum; draft letter motion for extension of time; discuss same with SS; file same with the Court; revise settlement agreement; send settlement papers to opposing counsel; discuss billing with JLN and SS; draft plan email; upload documents to case management system; correspond with potential class members; discuss drafting update for potential class members with SS.	TAG	\$285	\$684
1/8/2016	0.2	Line edit letter.	NMG	\$285	\$57
1/8/2016	0.1	Email case team re: letter motion requesting extension of time to file.	JGB	\$690	\$69
1/8/2016	2.7	Email exchange with opposing counsel re: settlement; edit and draft motion for extension of time; discuss same with JGB and TAG; discuss remaining edits to documents with TAG and JGB; email to class representatives re: update and schedule; discuss drafting language to all class members re: conference call; email case team re: plan and next steps; call with claim administrator re: status and next steps.	SS	\$405	\$1,094
1/8/2016	0.1	E-mail from opposing counsel re: liquidated damages now at \$450.00.	JLN	\$605	\$61
1/8/2016	0.1	Discuss next steps and extension for filing deadline with TAG.	MWS	\$515	\$0
1/9/2016	1.4	Discuss next steps and settlement with TAG; review and revise brief re: settlement approval; discuss same with SS.	MWS	\$515	\$670
1/9/2016	0.1	Email exchange with clients re settlement status.	JGB	\$690	\$69
1/10/2016	0.1	Review email exchange with case team and clients regarding next step.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/11/2016	2.1	Revise settlement agreement and notices; send same to opposing counsel; discuss same with SS; correspond with potential class members; calculate attorney's fees; revise motion for preliminary approval and supporting papers; enter phone notes for calls with attorneys general; upload documents to case management system.	TAG	\$285	\$599
1/11/2016	0.1	Email case team re: billing hours.	JGB	\$690	\$69
1/11/2016	1.4	Review revisions to settlement agreement and other documents; review edits to motion for preliminary approval; discuss with TAG re: correspondence with potential class members; email exchange with opposing counsel re: settlement.	SS	\$405	\$567
1/12/2016	3.3	Draft motion for preliminary approval; revise notices; discuss drafting and revisions with SS; correspond with claims administrator re: contact information; enter phone note for same; enter JLN's hours into case management system.	TAG	\$285	\$941
1/12/2016	1.5	Line edit memorandum of law in support of motion for preliminary approval.	MMH	\$295	\$443
1/12/2016	4.3	Review edits to motion for preliminary approval and other papers; discuss same with TAG; emails and call to opposing counsel re: status of settlement agreement; email exchange re: final copies; email exchange with claims administrator re: address and other contact detail; discuss edits with TAG; email to class representatives re: final signatures; review email to all class members and discuss same with TAG.	SS	\$405	\$1,742
1/12/2016	0.3	Touch base with case team re settlement paper; review most up to date motion for approval	JGB	\$690	\$207
1/13/2016	0.3	Touch base with case team re prep or settlement papers; emails to and from class reps re settlement questions.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/13/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
1/13/2016	4.8	Draft motion for preliminary approval; revise notices and settlement agreement; prepare documents for filing; correspond with plaintiffs re: signatures; enter phone note for same; correspond with opposing counsel re: updated documents; discuss filing, drafting, revisions, and next steps with SS; draft declaration in support of motion and notice of motion; correspond with claims administrator re: contract information.	TAG	\$285	\$1,368
1/13/2016	4.7	Edit motion for preliminary approval; research authority for same; review revised notices and settlement agreement; discuss same with TAG; review documents ready for filing; continue correspondence with opposing counsel re: same; correspond with plaintiffs re: signatures and review TAG's and JGB's correspondence re: same; review opposing counsel's edits and discuss same with TAG and JGB; discuss filing, drafting, revisions, and next steps with TAG; review and edit declaration in support of motion and notice of motion; correspond with claims administrator re: contract information and discuss same with TAG.	SS	\$405	\$1,904
1/14/2016	3.4	Revise motion for preliminary approval and supporting papers; correspond with potential class members; prepare documents for filing; discuss same with SS; file motion for preliminary approval and supporting papers.	TAG	\$285	\$969
1/14/2016	1.1	Review and provide thoughts on opposing counsel's edits to motion for preliminary approval; discuss filing and next steps with SS.	JGB	\$690	\$759

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/14/2016	4.4	Insert final edits to motion for preliminary approval and supporting papers; email exchange with opposing counsel and discussion with JGB re: same; discuss with TAG re: correspondence with potential class members; review all documents for final filing preparation; discuss same with TAG; supervise filing of motion for preliminary approval and supporting papers; discuss with TAG re: how to properly file and name each document; email correspondence with opposing counsel re: same; email exchange and call with claims administrators re: same and next steps; email to opposing counsel re: CAFA notice letter.	SS	\$405	\$1,782
1/15/2016	5.4	Prepare and send documents to opposing counsel; upload documents to case management system; complete weekly update, organization, and review of case files; update case summary memorandum; prepare and bring courtesy copies to the Court; discuss same and next steps with SS; review emails re: press and discuss same with SS; draft plan email; revise draft letter to potential class members and discuss same with SS.	TAG	\$285	\$1,539
1/15/2016	0.6	Respond to press inquiry; email case team and opposing counsel re: same.	JGB	\$690	\$414
1/15/2016	4.3	Email exchange with opposing counsel re: copies of filed papers; review JGB's email exchange with press and email exchange re: how to approach same; review past email exchange with opposing counsel re: same and discuss same with TAG; review courtesy copies and assist with same; discuss same with TAG; edit language to send to all class members and discuss edits with TAG; discuss same with JGB; email class administrators re: status.	SS	\$405	\$1,742

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/19/2016	3.9	Revise letter to class members; discuss same with SS; review JGB's edits and thoughts on same; prepare and send documents to claims administrator; draft email to opposing counsel re: CAFA notice; correspond with claims administrator re: CAFA notice; enter phone note for same; discuss CAFA and correspondence with claims administrator with SS; download press article on case and create Google alerts for future press; discuss next steps with SS; review logistics re: conference call with potential class members; discuss same with SS; create temporary Law360 account.	TAG	\$285	\$1,112
1/19/2016	0.6	Review and edit draft email to potential class members; email case team re: Law360 article.	JGB	\$690	\$414
1/19/2016	3.2	Edit letter to class members and discuss same with TAG; review JGB's edits and thoughts on same; email exchange and calls with claims administrator re: complying with statutory notice; email exchange with opposing counsel re: CAFA notice; discuss next steps with TAG; discuss logistics re: conference call with potential class members with TAG; review press coverage of settlement.	SS	\$405	\$1,296
1/19/2016	0.2	Line edit letter to class members.	MMH	\$295	\$59
1/20/2016	0.1	Discussed upcoming tasks with TAG.	JMS	\$495	\$0
1/20/2016	2.4	Correspond with Law360 re: updating information; enter phone note for same; email JGB re: same; correspond with the SDNY ECF help desk re: updating attorney information in PACER; email JGB re: same; correspond with Heffler re: setting up a conference call; discuss same with SS; email JGB re: same and letter to potential class members; email MJN re: letter to potential class members; revise letter to potential class members; discuss same, CAFA notice, and next steps with SS; begin drafting letter re: Craig Lanza's involvement in case; upload documents to case management system.	TAG	\$285	\$684

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/20/2016	0.6	Emails with case team re: information update on PACER and letter to potential class members.	JGB	\$690	\$414
1/20/2016	1.2	Email exchange with opposing counsel re: notices to state governments; review same; email exchange with claims administrator re: same and setting up conference call with class members; discuss same with TAG.	SS	\$405	\$486
1/21/2016	5.3	Draft letter to the court re: updating docket; discuss same with SS and JGB; correspond with ECF clerk and Judge Stein's deputy re: same; enter phone notes for same; email letter to Judge Stein's deputy; take notes on call with Heffler; correspond with Heffler re: documents; edit CAFA notice and discuss same with SS; upload documents to case management system; run MailChimp tests to ensure success of newsletter; edit newsletter and discuss same with SS; draft standard response to inquiries and discuss same with SS; send newsletter to potential class members; review emails and voicemails from potential class members.	TAG	\$285	\$1,511
1/21/2016	0.1	Discussed upcoming tasks with TAG.	JMS	\$495	\$0
1/21/2016	0.7	Review letter to the court re: docket corrections; emails with case team re: letter to class members; emails to case team re: corresponding to class members.	JGB	\$690	\$483

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/21/2016	5.6	Edit letter to the court re: updating docket; discuss same with TAG and JGB; discuss with TAG her calls with Court re: same; review email exchange with Judge Stein's deputy; call with claims administrators and discuss same with TAG; edit CAFA notice and discuss same with TAG; review TAG's additional edits; edit newsletter and discuss same with TAG; edit standard response to inquiries and discuss same with TAG; review emails and voicemails from potential class members; email exchange with JGB re: same; email exchange with opposing counsel re: CAFA notices.	SS	\$405	\$2,268
1/21/2016	0.2	Line edit letter to the court; line edit email.	MMH	\$295	\$59
1/21/2016	0.4	Review and edit letter to class members.	TJF	\$465	\$186
1/22/2016	3.8	Complete weekly update, organization, and review of case files; update case summary memorandum; correspond with potential class members; discuss same with SS; draft and send plan email; update class member database; enter phone notes for voicemails from potential class members; upload documents to case management system; correspond with opposing counsel re: CAFA notice; correspond with Judge Stein's deputy re: docket change; enter phone note for same; email case team re: same; research possibility of hosting a webinar for class members.	TAG	\$285	\$1,083
1/22/2016	2.8	Email exchange with claim administrators and opposing counsel re: final draft of CAFA notice; review same; discuss correspondence with class members with TAG; email exchange with class representative and class members; review class members emails; discuss with TAG setting up online webinar based conference call.	SS	\$405	\$1,134
1/22/2016	0.6	Email case team re: responding to new inquiries; correspond with plaintiff; email case team re: docket corrections.	JGB	\$690	\$414

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/25/2016	0.1	Discuss next steps and setting up webinar for class members with TAG.	MWS	\$515	\$0
1/25/2016	2.9	Discuss with TAG re: communication with class members; review order re: preliminary approval; discuss same and dates with TAG; call with claims administrators re: same; email next steps ideas to JGB; discuss moving dates for fairness hearing with JGB; review status of attorneys' fees motion.	SS	\$405	\$1,175
1/25/2016	3.2	Correspond with potential class members; research possibility of hosting a webinar for class members; discuss same with MWS and SS; email JGB re: same; review order granting preliminary approval of settlement; upload same document to case management system; enter new deadlines to firm calendar; draft updated standard response to new inquiries; discuss same with SS.	TAG	\$285	\$912
1/25/2016	0.3	Emails with case team re: conference call with class members; review and provide thoughts on case place memorandum.	JGB	\$690	\$207
1/26/2016	0.1	Discuss next steps, preliminary approval, and webinar for class members with TAG.	MWS	\$515	\$0
1/26/2016	5.7	Review webinar possibilities and discuss same with TAG and JGB; discuss setting up particular time for discussion of class members concerns through webinar; review and revise notices with dates from Court's order; discuss same with TAG; call and email exchange re: same with claim administrators; edit motion for fees and discuss with TAG re: sending it to JGB; edit email to class members re: webinar and questions; review table of upcoming dates and deadlines and discuss same with TAG.	SS	\$405	\$2,309
1/26/2016	0.3	Emails with case team re: webinar.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/26/2016	6.6	Sign up for GoToWebinar trial and set up webinar for class members; discuss same SS and JGB; email MJN re: logistics of webinar; revise notices with dates from Court's order; send notices and order to claims administrator; revise motion for fees and send to JGB; draft email to class members re: webinar and questions; draft memorandum re: questions from class members; draft table of upcoming dates and deadlines.	TAG	\$285	\$1,881
1/27/2016	3.1	Determine next steps and email to opposing counsel re: same; email opposing counsel re: adjournment of fairness hearing; calls with claims administrators and email exchange re: data transfer; email opposing counsel re: same; email to claims administrators and opposing counsel re: connecting them for purposes of data transfer; edit language to send to class members re: webinar and other concerns.	SS	\$405	\$1,256
1/27/2016	0.8	Prepare and send newsletter to class members re: webinar; discuss same with SS; review responses from class members; discuss next steps and notices with SS.	TAG	\$285	\$228
1/27/2016	0.2	Review and email case team re: letter to class members re: webinar.	JGB	\$690	\$138
1/27/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
1/28/2016	2.1	Draft response to new inquiries and discuss same with SS; review and download recent web articles about settlement; upload documents to case management system; correspond with Top Class Actions re: recent article; correspond with potential class members; review emails from potential class members; draft memorandum re: questions from potential class members.	TAG	\$285	\$599
1/28/2016	0.1	Review draft response to new inquiries about action.	JGB	\$690	\$69
1/28/2016	0.1	Discussed upcoming tasks with TAG.	JMS	\$495	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/28/2016	1.4	Email exchange with opposing counsel re: fairness hearing; edit language to send to class members re: next steps; discuss same with TAG; review emails from class members re: conference call and discuss responding to same with TAG; review media articles re: settlement and discuss with TAG re: following up.	SS	\$405	\$567
1/29/2016	1.8	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; draft and send case plan memorandum; draft memorandum re: questions from potential class members; correspond with potential class members.	TAG	\$285	\$513
1/29/2016	0.2	Email with case team re: motion for fees and status of settlement.	JGB	\$690	\$138
1/29/2016	1.6	Email exchange with claims administrators re: transfer of data; email exchange with JGB re: same; email exchange with JLN re: attorneys' fees motion; discuss same with TAG; review same; email to case team re: plan and next steps; discuss with TAG re: correspondence with potential class members; discuss with TAG re: memo with questions to address at conference call; review same.	SS	\$405	\$648
1/31/2016	0.5	Review and give thoughts on case summary memorandum; review questions from class members and possible answers; email case team re: prep for upcoming phone call.	JGB	\$690	\$345
2/1/2016	1.2	Correspond with potential class members; correspond with claims administrator; revise notices and discuss same with SS.	TAG	\$285	\$342

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/1/2016	1.5	Meet with JGB re: communication with class members and other steps to take going forward including valuation expert; email exchange with opposing counsel re: transfer of money and fairness hearing schedule; call with claims administrators re: same; discuss same with TAG; email exchange with claims administrators re: same; discuss with TAG re: sending updated notices; discuss with TAG re: emailing class members back; meet with TAG re: questions for webinar and schedule session to draft responses.	SS	\$405	\$608
2/1/2016	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
2/2/2016	2.8	Correspond with potential class members; draft memorandum re: class members' questions and proposed answers; discuss same with SS; enter phone notes for correspondence with class member and claims administrator; draft email to opposing counsel.	TAG	\$285	\$798
2/2/2016	2.4	Edit and draft memorandum re: class members' questions and proposed answers for webinar; discuss same with TAG; call with class members re: their questions; call with claims administrator re: notices and next steps; edit and send email to opposing counsel re: next steps.	SS	\$405	\$972
2/3/2016	2.2	Correspond with Court Deputy re: attorney information on docket; prepare for webinar; discuss webinar logistics with MJN and SS; email case team re: webinar logistics; correspond with Top Class Actions editor re: attorney information in article; take notes on phone call with class member; enter phone note for same; discuss same with SS.	TAG	\$285	\$627
2/3/2016	0.2	Email with case team re: webinar logistics.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/3/2016	2.6	Discuss with TAG re: docket changes; prepare for webinar; discuss webinar logistics with MJN and TAG; email re: same; discuss with TAG re: case related media publications; correspond with class members and discuss same with TAG; research re: potential billing audit and expert engagement.	SS	\$405	\$1,053
2/4/2016	1.4	Prepare for and hold webinar with potential class members; discuss same and next steps with case team.	JGB	\$690	\$966
2/4/2016	3.9	Prepare for and take notes during webinar; discuss same with case team; correspond with class members; review emails from class members; draft letter to the court requesting adjournment; discuss same with SS; file letter with the court; download and review webinar statistics report.	TAG	\$285	\$1,112
2/4/2016	0.1	Discussed case tasks with TAG.	JMS	\$495	\$0
2/4/2016	0.2	Line edit letter re: adjournment.	MMH	\$295	\$59
2/4/2016	3.5	Prepare all logistics for webinar and discuss same with case team; correspond with class members before, during, and after webinar; review emails from class members; edit letter to the court requesting adjournment; discuss same with TAG re: my edits to same; review webinar statistics report; call with claims administrators re: notices status.	SS	\$405	\$1,418
2/5/2016	3.6	Draft plan email; draft email to class representatives re: timeline of upcoming events; correspond with class members; discuss same with SS; complete weekly update, organization, and review of case files; update case summary memorandum; enter phone notes for correspondence with class members; take notes on conference call with claims administrator; enter phone note for same; format and review excel sheet of webinar questions from class members.	TAG	\$285	\$1,026

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/5/2016	3.8	Email case team re: plan and next steps; review email to class representatives re: timeline of upcoming events; correspond with class members; discuss same with TAG; conference call with claims administrator re: notice and vouchers; review settlement documents and email exchange re: same.	SS	\$405	\$1,539
2/8/2016	0.2	Discuss settlement status and administrator follow up with case team	JGB	\$690	\$138
2/8/2016	0.4	Email exchange with potential class member; discuss same with TAG; review next steps and plan email.	SS	\$405	\$162
2/8/2016	1.8	Assemble court file binder; correspond with potential class member; discuss same with SS.	TAG	\$285	\$513
2/9/2016	0.1	Discuss next steps and follow-up with class members with TAG.	MWS	\$515	\$0
2/9/2016	0.8	Email exchange with claims administrators and opposing counsel re: outstanding issues and notices schedule; call with potential class member.	SS	\$405	\$324
2/9/2016	1.1	Take notes on phone call with potential class member; format class member database into version for sending to claims administrator.	TAG	\$285	\$314
2/10/2016	3.8	Email exchange with claims administrators re: notices, website language, and call center transcript; edit same and discuss same with JGB and TAG; discuss with TAG re: correspondence with class members; review emails re: same; call with class member re: eligibility and opting out; email exchange with JGB re: expert witness engagement and research same.	SS	\$405	\$1,539

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/10/2016	2.2	Review website content and dial-in transcript from Heffler; discuss same with SS; edit dial-in transcript and send to Heffler; correspond with potential class members; discuss same with SS; enter phone note for correspondence with potential class members.	TAG	\$285	\$627
2/10/2016	0.6	Correspond with SS re: language for dial-in transcript from claims administrator; email case team re: correspondence with potential class member.	JGB	\$690	\$414
2/11/2016	5.7	Research re: evaluation of injunctive relief; email exchange with claims administrator re: same; call with potential expert witness; discuss same with TAG; email to JGB re: same; review research and discuss same with BLG; review expert affidavits in other cases; review email exchange between defendants' counsel, representative, and claims administrators re: data processing; discuss notice dates with TAG.	SS	\$405	\$2,309
2/11/2016	5.1	Conduct Westlaw and outside research re: potential expert witnesses; discuss same with SS; review settlement agreement and create schedule of upcoming dates; discuss same with SS; enter phone note for conversation with potential expert witness; review emails from claims administrator; enter expenses in case management system; search for and review web articles re: settlement; upload document to case management system.	TAG	\$285	\$1,454
2/11/2016	2.3	Research expert witness to value injunctive relief	BLG	\$290	\$667

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/12/2016	3.3	Complete weekly update, organization, and review of case files; review settlement documents re: voucher download and altering notices; take notes on call with potential expert; enter phone note for same; draft plan email; line edit email to opposing counsel; format class member records and send to Heffler; discuss next steps, changing notices, and voucher redemption with SS; take notes on call with Heffler; enter phone note for same.	TAG	\$285	\$941
2/12/2016	0.7	Email case team re: adding language to notices; discuss status with SS.	JGB	\$690	\$483
2/12/2016	4.3	Research re: potential expert; call with claims administrators re: same; call with potential expert and discuss evaluation of injunctive relief; discuss same with JGB; cal with claims administrators re: data transfer and notices; email exchange re: same; emails to opposing counsel re: same; review edits to opt out form; edit other documents.	SS	\$405	\$1,742
2/14/2016	0.1	Email exchange with case team re: next steps in settlement	JGB	\$690	\$69
2/15/2016	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
2/15/2016	0.6	Edit language to class representatives re: timing of next steps; email exchange with claims administrators re: edits to various documents.	SS	\$405	\$243
2/16/2016	2.4	Draft emails to class representatives re: attending fairness hearing; discuss same with SS; line edit email to potential injunctive relief expert; correspond with case team re: law firm inquiring about action; email paralegal from same law firm; review email from California Deputy Attorney General re: scheduling a conference call with government agencies; draft memorandum addressing the questions posed by same; discuss same with SS.	TAG	\$285	\$684

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/16/2016	0.1	Line edit letter.	MMH	\$295	\$30
2/16/2016	1.2	Correspond with California deputy attorney general re: scheduling a conference call with representatives from government agencies; email case team re: same and next steps; email case team re: correspondence from attorney re: potential class member.	JGB	\$690	\$828
2/16/2016	0.1	Discuss next steps and client contact with TAG.	MWS	\$515	\$0
2/16/2016	3.8	Email exchange with claims administrators re: data transfer and re: finalizing of documents to send with notice; discuss same with TAG; edit language to class representatives re: attending fairness hearing and discuss same with JGB; discuss with TAG re: correspondence with class members and review same; research re: potential experts and draft letters to academics specializing in filed; discuss same with TAG; email exchange with various states' attorney generals re: conference call; discuss drafting answers to their questions with TAG and JGB.	SS	\$405	\$1,539
2/17/2016	3.1	Call with professor Fitzpatrick re: expert analysis of injunctive relief; email exchange re: same; email exchange with claims administrators re: notices; discuss edits to short form notice and discuss same with TAG; review email exchange with class representatives; review scholarly articles re: empirical study of compensation in consumer class actions.	SS	\$405	\$1,256
2/17/2016	2.8	Correspond with class representatives re: next steps and attending the fairness hearing; discuss same with SS and email JGB re: same; correspond with Heffler and opposing counsel re: next steps and short notice; enter phone notes for same; discuss same with SS; revise short notice and send to Heffler and opposing counsel.	TAG	\$285	\$798
2/17/2016	1.2	Review draft language for emails to class representatives; email with case team re: upcoming call with government agencies.	JGB	\$690	\$828

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/17/2016	0.1	Discuss status and next steps with TAG.	TJF	\$465	\$0
2/18/2016	2.2	Email exchange with opposing counsel and claims administrators re: finalizing documents and schedule; call with claims administrators re: same; discuss with case team re: call with attorney generals' offices; prepare for same; email exchange with class representatives re: attending fairness hearing.	SS	\$405	\$891
2/18/2016	2.9	Correspond with class representative; discuss same with SS; review JGB's email re: same; correspond with Heffler; enter phone note re: same; discuss same with SS; review emails between Heffler, case team, and opposing counsel; set up conference call for call with government agencies; email information to agencies; email case team re: same; begin researching travel arrangements for class representative's travel to fairness hearing; discuss motion for fees and conversation with class action expert with SS.	TAG	\$285	\$827
2/18/2016	1.5	Email case team re: correspondence with class representatives, conference call with government representatives, and next steps; email potential expert; emails with administrator and defense counsel.	JGB	\$690	\$1,035
2/19/2016	0.9	Correspond with claims administrator re: notices; email case team re: attorney's fees and conference call with government agencies; discuss status with SS.	JGB	\$690	\$621
2/19/2016	1	Participate in conference call with government representatives re: the settlement.	JLN	\$605	\$605

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/19/2016	2.8	Email exchange with TAG re: class representative's travel; review email exchange with class representatives re: same; discuss with TAG re: correspondence with class members; email exchange with claims administrators re: notices; call and email exchange with JGB re: call with attorney general's offices; edit email to case team and send same re: next steps and plan.	SS	\$405	\$1,134
2/19/2016	3.1	Complete weekly update, organization, and review of case files; take notes on conference call with government agencies; email case team re: same; discuss same with SS; correspond JLN re: billing for this matter; draft and send case plan memorandum; discuss same with SS; correspond with potential class member; email JGB re: fairness hearing travel arrangements for class representative.	TAG	\$285	\$884
2/19/2016	0.1	Discuss next steps and communication with class members with TAG.	MWS	\$515	\$0
2/21/2016	0.2	Review and give thoughts on case summary memorandum.	JGB	\$690	\$138
2/22/2016	1.3	Review test email from claims administrators and exchange emails re: same; discuss hotels for class representatives with TAG; email exchange with JGB re: undeliverable emails to outside counsel' email re: same; discuss with TAG re: communication with potential class members.	SS	\$405	\$527
2/22/2016	1.6	Enter JGB's expenses in case management system; email JLN re: motion for fees; discuss same with SS; research hotels and flights for class representative; email case team re: same; review proposed email notice from Heffler.	TAG	\$285	\$456

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/23/2016	3.7	Research hotels and flights for class representative and email JGB re: same; take notes on phone call with Heffler; review settlement website and proposed mailing; draft email re: concerns with and edits to same; discuss same with SS; review settlement agreement for language re: multiple dates.	TAG	\$285	\$1,055
2/23/2016	2.6	Review and edit final versions of notices and website; email exchange with claims administrators re: same; discuss with TAG re: following up with attorney general re: issues raised on call; call with claims administrators re: outstanding issues and format of mailed out notices; email re: same to claims administrators and opposing counsel.	SS	\$405	\$1,053
2/23/2016	0.1	Discuss next steps and contact with class members with TAG.	MWS	\$515	\$0
2/24/2016	2.8	Email exchange with former class representative and discuss his concerns same with JGB and TAG; email exchange and calls with claims administrators re: final versions of website and other documents; review email from opposing counsel re: omission in short ofr notice; discuss with TAG re: travel details for class representative for fairness hearing.	SS	\$405	\$1,134
2/24/2016	0.9	Draft email language to potential class member and discuss same with SS; enter expenses in case management system; review action website and discuss same with SS; review hotels for travel arrangements for fairness hearing.	TAG	\$285	\$257
2/24/2016	0.2	Review and provide thoughts on draft email language to to class members.	JGB	\$690	\$138
2/24/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/25/2016	4.1	Research travel arrangements for fairness hearing; correspond with Millenium Hilton and make reservations for fairness hearing; enter phone note for same; email case team and MJN re: same; scan and upload notes to case management system; transcribe notes from call with government agencies; enter phone notes for voicemails from class members; discuss same and corresponding with class members with SS; draft email response to class members; draft monthly update; discuss drafting emails and next steps with SS.	TAG	\$285	\$1,169
2/25/2016	0.2	Email TAG re: booking hotel for fairness hearing; email case team re: corresponding with potential class members and next steps.	JGB	\$690	\$138
2/25/2016	2.4	Discuss next steps with JGB re: attorneys' fees application and general; review notices as they went out; email exchange with claims administrators re: same; review voice mails and emails re: class members questions; meet with TAG re: same; review draft language to class members on mailing list.	SS	\$405	\$972
2/26/2016	4.8	Email exchange and calls with class members re: questions about notices, vouchers, and terms of settlement; discuss same with JGB and TAG; review voice mails re: same; review email exchange with claims administrators re: status; review voice mail system and answers to questions it provides; review memorandum of correspondance with class members; email case team re: next steps and plan.	SS	\$405	\$1,944
2/26/2016	6.9	Complete weekly update, organization, and review of case files; correspond with class members; discuss same with SS; draft case plan memorandum; enter expenses in case management system; send monthly update to class members; email JLN re: billing; listen to voicemails and review emails from class members; draft memorandum re: correspondence with class members.	TAG	\$285	\$1,967

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/26/2016	1.7	Emails with case team re: next steps and correspondence with class members; review draft email to class members; discuss follow up with class members with case team.	JGB	\$690	\$1,173
2/29/2016	8.6	Correspond with class members via telephone and email; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; take notes on phone call with Heffler; discuss next steps with SS; draft memorandum re: follow up correspondence.	TAG	\$285	\$2,451
2/29/2016	5.2	Discuss with JGB re: affidavits for class members who we spoke to to sign; discuss with JGB re: correspondance with magistrate judge re: settlement; review of website and call system in light of class members' complaints; call with Dave from Heffler re: claims forms issues and status; correspond with class members; review letter from class member re: objection; discuss with TAG re: compiling list of individuals who noted that they did not receive notices; email JGB re: status of correspondance with class members; disucss with TAG re: addressing attorney generals' questions; review correspondance with class members.	SS	\$405	\$2,106
2/29/2016	0.3	Discuss notice and related issues with SS.	JGB	\$690	\$207
2/29/2016	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
3/1/2016	8.1	Correspond with class members via telephone and email; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; draft memorandum re: follow up correspondence; review records and identify class members for potential affidavits and draft memorandum re: same.	TAG	\$285	\$2,309
3/1/2016	0.3	Email case team re: objections and affidavits from class members; discuss status with SS.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/1/2016	4.4	Review class members communication and work with TAG to address same; review objections and email to JGB re: same; email exchange with California attorney general's office and opposing counsel re: questions and responding to same; email to BLG re: research for attorneys fees' application; research re: valuation of injunctive relief and lodestar method arguments; discuss class members' affidavits to use in application with TAG.	SS	\$405	\$1,782
3/2/2016	0.8	Email case team re: objections and drafting memorandum in preparation for fairness hearing; discuss with SS.	JGB	\$690	\$552
3/2/2016	3.5	Correspond with class members and review inquiries; discuss same with TAG; review her emails and discuss her calls with class members; review JGB's email re: memorandum for objections and keeping track of communication with class members; correspond with claims administrators re: notices and status; discuss same with JGB including email bounce percentage; discuss with TAG re: cross check with claims administrators re: individuals who contacted us and IJL database; discuss with TAG and review material produced during discovery re: office in which various class members signed up for contract for IJL.	SS	\$405	\$1,418
3/2/2016	6.7	Correspond with class members via telephone and email; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; draft memorandum re: follow up correspondence; prepare Excel spreadsheet re: class member data to check and send to Heffler; discuss possible candidates for affidavits with SS; take notes on SS phone calls with class members.	TAG	\$285	\$1,910

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/3/2016	3.7	Email exchange with opposing counsel re: objections; call with class member and potential objector re: definition of New York class and release; review and research same; discuss same with JGB; edit motion for attorneys fees and discuss with TAG re: sending same to outside counsel for review; review other correspondence with class members and discuss with TAG re: same and memorandum keeping track of same; email exchange with claims administrators re: database and missing names.	SS	\$405	\$1,499
3/3/2016	0.1	Discussed upcoming case tasks with TAG.	JMS	\$495	\$0
3/3/2016	5.7	Correspond with class members via telephone and email; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; draft memorandum re: follow up correspondence; take notes on SS phone calls with class members; send documents to outside counsel; review documents for class definition.	TAG	\$285	\$1,625
3/4/2016	7.1	Correspond with class members via telephone and email; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; draft memorandum re: follow up correspondence; revise motion for fees and discuss same with SS; send documents to outside counsel; calculate total firm billing and discuss same with SS; review emails and documents to find information re: class members who are have active IJL memberships.	TAG	\$285	\$2,024
3/4/2016	0.2	Input phone notes into case management system.	NMG	\$285	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/4/2016	3.3	Insert JGB's edits to fees application; discuss same and emailing to outside counsel for review; email exchange with claims administrators re: class members's questions and website issues; review messages and voice mails from class members; discuss responses with TAG; email to case team re: next steps and plan; review objections and email exchange with opposing counsel re: same; review hours calculation and discuss same with TAG; email exchange with JGB re: letter to Judge Netburn.	SS	\$405	\$1,337
3/6/2016	2.9	Correspond with class members; enter phone notes for voicemails left by class members; update case summary memorandum; scan and upload documents to case management system; draft letter to Court and discuss same with SS; discuss next steps and obtaining potential affidavits with SS; continue drafting memorandum re: follow up correspondence.	TAG	\$285	\$827
3/7/2016	2.7	Draft and edit letter to magistrate judge re: status; discuss same with TAG; email JGB re: same and operative draft; email exchange with opposing counsel re: objections; review same; review emails and voice mails from class members and discuss with TAG re: addressing same; review material from mediation re: content of letter to magistrate judge re: mediator's report.	SS	\$405	\$1,094
3/7/2016	0.2	Discuss formatting letter to the court with SS; format letter on letterhead.	KMB	\$295	\$59

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/8/2016	7.8	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; upload documents to case management system; correspond with Heffler re: court-filed claims and claims mailed to firm; enter phone note for same; discuss same with SS; edit letter to Court and discuss same with SS; review Judge Netburn's rules; email letter to Judge Netburn; correspond with opposing counsel re: same; identify potential class member candidates for submitting affidavits; discuss same with SS; draft memorandum re: same and email to JGB; enter expense in case management system; continue drafting memorandum re: follow up correspondence.	TAG	\$285	\$2,223
3/8/2016	0.7	Review and edit letter to the Court; email exchange with SS re: court-filed objections and correspondence with opposing counsel.	JGB	\$690	\$483
3/8/2016	4.4	Call with class members re: settlement; discuss same with TAG; review claims administrators' report and discuss same with Dave from Heffler over phone; discuss same with TAG; edit and draft letter to Judge Netburn; discuss same with JGB and review his edits; email exchange with opposing counsel re: consent to sending same; review voice mails and emails from class members; review TAG's email exchange with claims administrators re: claims we received directly; review filed objections.	SS	\$405	\$1,782
3/8/2016	0.1	Discussed upcoming case tasks with TAG	JMS	\$495	\$0
3/9/2016	0.7	Research and draft fee arrangement under lodestar in a class action portion of fee agreement brief	BLG	\$290	\$203

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/9/2016	2.3	Edit and draft motion for attorneys' fees and discuss same with TAG; email re: same and new draft to JGB; review correspondence with class members and discuss same with TAG; review voice mails re: same; review emails from Connecticut attorney general forwarded by opposing counsel and email exchange re: same.	SS	\$405	\$932
3/9/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
3/9/2016	0.2	Discuss status of settlement and notice with SS.	JGB	\$690	\$138
3/9/2016	6.9	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; draft portion of motion for attorney's fees and discuss same with SS; enter expense in case management system; continue drafting memorandum re: follow up correspondence.	TAG	\$285	\$1,967
3/10/2016	0.4	Email Judge Netburn's law clerk re: mediation report; email TAG re: translating notice to Spanish.	JGB	\$690	\$276
3/10/2016	3.8	Call with class member re: settlement; discuss with TAG re: call with claims administrators re: website and telephone service issues; discuss with TAG re: motion to file excess pages and reviewing Judge's individual rules re: same; review email from California attorney general and opposing counsel's response re: unresolved issues; draft response to class members seeking information about attorneys fees; review objections filed by Court.	SS	\$405	\$1,539
3/10/2016	8.9	Correspond with Heffler re: website and phone issues and cost of translation; correspond with class members; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; take notes on SS's call with class member; continue drafting memorandum re: follow up correspondence; research and draft letter motion to file excess pages; discuss same with SS.	TAG	\$285	\$2,537

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/11/2016	3.4	Edit affidavits to class members and discuss general content with TAG; draft emails to class members in response to their inquiries; discuss same with TAG; draft and edit plan memorandum and email case team re: next steps and plan; draft motion for additional pages; email exchange with opposing counsel re: same; email exchange with Connecticut attorney general's office re: pricing, fees, NY Class, and other inquiries; email exchange with opposing counsel re: same; review email exchange with California attorney general's office and discuss same with JGB.	SS	\$405	\$1,377
3/11/2016	0.3	Discuss with SS settlement and client follow up status.	JGB	\$690	\$207
3/11/2016	5.6	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; continue drafting memorandum re: follow up correspondence; draft case plan memorandum; revise letter motion for leave to file excess pages and discuss same with SS; line edit SS's email to class member; draft class member affidavit in support and discuss same with SS.	TAG	\$285	\$1,596
3/13/2016	0.2	Review and give thoughts on case summary memorandum; discuss status with SS.	JGB	\$690	\$138
3/14/2016	3.6	Review status update re: claims and notices from claims administrators; call with claims administrators re: same; discuss same with TAG; review updated pricing and discuss same with TAG; discuss difference in pricing and call to claims administrators re: difference in each itemized cost filed; email from former class representative re: various questions and service awards meaning; review objections; review changes to fees application and edit same.	SS	\$405	\$1,458

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/14/2016	7.7	Draft email language to class members re: affidavits; discuss same with SS; review and compare pricing estimate to current pricing and discuss same with SS; correspond with class members; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; continue drafting memorandum re: follow up correspondence.	TAG	\$285	\$2,195
3/15/2016	7.2	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; continue drafting memorandum re: follow up correspondence; email class members re: affidavits; discuss same with SS; research and book flight for class representative; correspond with class representative re: same; discuss same with SS; correspond with Heffler re: pricing and enter phone notes for same; discuss same with SS; enter expenses in case management system; email JGB and Heffler re: translating notice.	TAG	\$285	\$2,052
3/15/2016	0.1	Discussed upcoming tasks with TAG.	JMS	\$495	\$0
3/15/2016	3.2	Draft email responses to class members; discuss same with TAG; review objections and discuss same with case team; schedule calls with class members; discuss logistics of class representatives attending fairness hearing; email exchange re: same; email exchange with claims administrators re: updated pricing; email exchange with JGB re: translation of notice to Spanish and discuss same with TAG; update caselaw on lodestar method analysis when computation of injunctive relief is difficult.	SS	\$405	\$1,296
3/15/2016	0.2	Correspond with case team re settlement and notice issues.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/16/2016	3.9	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; discuss correspondence with SS; continue drafting memorandum re: follow up correspondence; email class representative re: flight information; discuss next steps with SS; revise and file letter motion to file excess pages and discuss same with SS and JMS; upload documents to case management system; correspond with class members re: affidavits.	TAG	\$285	\$1,112
3/16/2016	3.1	Review phone calls from class members and discuss responses with TAG; email correspondence with former class representative re: call and questions re: statute of limitations; review memorandum of correspondence with class members; edit and file motion for additional pages for fees application; edit fees application; email exchange with claims administrators re: notices and change of address for class members who reached out to firm; email exchange with opposing counsel re: responding to questions posed by attorney generals; review responses from defendants.	SS	\$405	\$1,256
3/16/2016	0.2	Line edit letter motion to file excess pages.	MMH	\$295	\$59
3/17/2016	2.4	Discuss next steps with SS; take notes on calls with class members and discuss same with SS; correspond with class members and enter phone notes for same; review files to locate specific documents for SS; sort emails and documents; review order re: excess pages and discuss same with SS.	TAG	\$285	\$684
3/17/2016	2.5	Email exchange with class members and former class representative; discuss same with TAG and review email correspondence and case filings re: same in advance of call; discuss with TAG re: correspondence with other class members; email exchange with JLN re: edits to application for fees; discuss same with JGB; add reference to court filings to application for fees and discuss same with TAG.	SS	\$405	\$1,013

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/18/2016	4.8	Discuss next steps, affidavits, and motion for fees with SS; correspond with class members; draft affidavit for class members; email class members re: affidavits and prepare same for signing; email case team re: progress with affidavits; draft case plan memorandum; review motion for fees and determine information and drafting needed.	TAG	\$285	\$1,368
3/18/2016	3.3	Discuss with TAG re: getting affidavits from class members; review correspondence with class members re: same; discuss same with TAG; email exchange with opposing counsel re: number of current members of IJL to add to valuation computation for application fee; email to case team re: plan and next steps; discuss edits to brief with TAG; edit same.	SS	\$405	\$1,337
3/19/2016	0.1	Review and sort emails from class members; correspond with class member re: affidavits.	TAG	\$285	\$29
3/19/2016	0.2	Review email exchange with class members re: affidavits.	SS	\$405	\$81
3/21/2016	5.4	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; continue drafting memorandum re: follow up correspondence; draft affidavits for class members; correspond with class members re: affidavits; upload documents to case management system; draft motion for fees and discuss same with SS; prepare document with class member information to discuss with Heffler and correspond with Heffler re: same.	TAG	\$285	\$1,539
3/21/2016	2.1	Edit motion for fees; discuss same with TAG; discuss research re: service fees with BLG; review same; discuss edits with JGB and email him re: same.	SS	\$405	\$851
3/21/2016	4.1	Research service incentive for class representatives (named plaintiffs) and edit brief appropriately with such research	BLG	\$290	\$1,189

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/21/2016	0.2	Discuss weekly tasks with TAG and BLG.	JLM	\$495	\$50
3/21/2016	2.1	Review and edit motion for attorney's fees; discuss attorney's fees motion and prep for fairness hearing with SS.	JGB	\$690	\$1,449
3/21/2016	0.4	Discuss next steps with SS; review IJL's document production; export email information from Thunderbird.	KMB	\$295	\$118
3/22/2016	0.1	Discuss next steps, attorneys' fee brief, declaration, and calls with clients with TAG.	MWS	\$515	\$0
3/22/2016	8.9	Correspond with class members; enter phone notes for voicemails and phone calls to and from class members; continue drafting memorandum re: follow up; correspondence; continue drafting motion for fees, notice of motion, and declaration; discuss same with SS; correspond with class members re: affidavits; upload documents to and enter expenses in case management system.	TAG	\$285	\$2,537
3/22/2016	1.8	Review and provide edits for motion for fees; email case team re: same.	JGB	\$690	\$1,242
3/22/2016	8.1	Edit and draft application for attorneys fees; discuss same with TAG; review JGB's edits and exchange emails re: same; research re: same; discuss with KMB re: calculating number of emails exchanged with class members over history of case; email exchange with opposing counsel re: objections; discuss addressing same with JGB.	SS	\$405	\$3,281
3/22/2016	3.2	Review case plan memorandum; discuss with MJN exporting email headers from thunderbird; research programs to export header information from Thunderbird; discuss the same with Ss export updated header information from Thunderbird; export all call information from case management system; review Thunderbird header information for all communications between firm and class members.	KMB	\$295	\$944

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/23/2016	7.3	Correspond with class members; continue drafting memorandum re: follow up correspondence; correspond with class members re: affidavits; upload documents to and enter expenses in case management system; apply JGB's edits to motion for fees brief, declaration, and notice; continue drafting same; discuss same with case team; complete calculations re: billing and phone calls.	TAG	\$285	\$2,081
3/23/2016	3.8	Research and draft fees section regarding incentive award for named plaintiffs and lodestar vs percent of fund methods	BLG	\$290	\$1,102
3/23/2016	1.8	Review and edit motion for fees papers; email case team re: same.	JGB	\$690	\$1,242
3/23/2016	6.4	Review Thunderbird email headings spreadsheet to for class member emails; calculate total expenses for matter; discuss email and expenses with SS; draft affidavit of MJN.	KMB	\$295	\$1,888
3/23/2016	1.9	Discuss work on memorandum of law in support of motion for fees with SS; enter JGB edits into memorandum of law.	MMH	\$295	\$561
3/23/2016	8.6	Edit and draft declaration of JGB; discuss same with JGB over telephone and by email; review edits to same and discuss same with TAG; edit application and email exchange with JLN re: same; discuss same with TAG and JGB; review docket and court filings and correspondence re: facts and procedural history; discuss same with TAG; discuss class members' correspondence with KMB and TAG; review same; review expenses table and discuss same with TAG and KMB; edit and draft MJN affidavit; email exchange with class members re: affidavits and discuss same with TAG; email exchange with opposing counsel re: information to include in application for fees; discuss review with JLM; discuss research re: authority with BLG and review same.	SS	\$405	\$3,483
3/24/2016	0.1	Discussed upcoming case tasks with TAG.	JMS	\$495	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/24/2016	9.4	Correspond with class members re: affidavits; upload documents to and enter expenses in case management system; apply JGB's edits to motion for fees brief and declaration; continue drafting same; discuss same with SS; complete calculations re: billing and hours; review opposing counsel's and claims administrator's websites to gather documents for exhibits.	TAG	\$285	\$2,679
3/24/2016	1.5	Research and draft language for section regarding proving reliance; cite check brief for fees	BLG	\$290	\$435
3/24/2016	2.3	Review and edit motion for fees brief and declaration; correspond with case team re: case facts and plan for motion papers.	JGB	\$690	\$1,587
3/24/2016	0.1	Discuss case status and next steps with SS.	KMB	\$295	\$30
3/24/2016	0.2	Line edit MJN affidavit in support of motion for fees.	MMH	\$295	\$59
3/24/2016	7.8	Review and insert JGB edits to fees application brief; discuss same with TAG; call with JGB re; same; continue drafting application and update factual details re: various procedural issues throughout history of case; email exchange with JLN re: identity of deposed parties; review docket re: same; review JLN's edits and include same; discuss same with JGB; edit declaration per JGB's edits and discuss same with TAG; review MJN affidavit and discuss signing of same with MJN; discuss with JGB and TAG re: class members' affidavits; review same; discuss with JLM re: review of brief; review her comments and incorporate same accordingly; email near file-ready draft to JGB and email re: plan for final edits and filing; email exchange with opposing counsel re: information to include in application; review production re: same information and incorporate same into application; review hours and expenses calculation and redraft expenses section.	SS	\$405	\$3,159

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/24/2016	1.7	Edit motion for fees; discuss same with SS.	JLM	\$495	\$842
3/25/2016	9.3	Complete weekly update, organization, and review of case files; update case summary memorandum; correspond with class members re: settlement and affidavits; draft and apply edits to motion for fees brief and declaration; compile exhibits for same; file motion for fees papers with the Court; discuss same with SS; upload documents to case management system; send court-filed documents to opposing counsel; calculate hours and percentage of time billed per staff member.	TAG	\$285	\$2,651
3/25/2016	2.6	Review and provide edits on motion for fees brief and declaration; email exchange with case team re: same.	JGB	\$690	\$1,794
3/25/2016	0.8	Perform line read of Affirmation.	NMG	\$285	\$228
3/25/2016	1.9	Line edit motion for fees.	MMH	\$295	\$561
3/25/2016	1.7	Review and revise brief for attorneys' fees; discuss same with SS and TAG.	MWS	\$515	\$876
3/25/2016	6.8	Finalize brief and prepare for filing; insert final edits and supervise final line edits and source checking; edit brief and declaration; discuss with TAG re: inserting additional information re: administrative fees; discuss with MWS re: general comments and incorporate same accordingly; review exhibits before filing; supervise filing; discuss with TAG re: filing event; email exchange with JGB re: same.	SS	\$405	\$2,754
3/26/2016	0.4	Email exchanges with case team re amendment to declaration and next steps.	JGB	\$690	\$276

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/28/2016	8.1	Call with clerk re: refilling of papers; edit declaration to insert additional paragraphs re: billing; edit tables in both brief and declaration work with TAG to create expenses and hours breakdown to submit to Court with application; discuss with BLG re: research about same; email exchange with JLN re: status of same; calls with JGB re: billing and expenses; review new exhibits and check and correct hours calculation in was it was slit between expenses and fees; supervise filing of same.	SS	\$405	\$3,281
3/28/2016	0.8	Correspond with case team re: corrected filing; review and provide thoughts on case plan memorandum.	JGB	\$690	\$552
3/28/2016	10.3	Correspond with ECF clerk re: correcting filing; enter phone note for same; calculate attorney's fees and expenses; discuss expense calculations with KMB; revise declaration and memorandum; create itemized billing sheets for fees and expenses; upload documents to case management system; assemble exhibits for motion for fees; file corrected memorandum, declaration, and exhibits; review PACER for motion for attorney's fees files and exhibits in other class actions and download same; discuss all with SS; correspond with class members.	TAG	\$285	\$2,936
3/28/2016	1.8	Research and draft reverse veil piercing memo	BLG	\$290	\$522
3/28/2016	0.9	Ensure accuracy of table calculations in motion for fees brief; review numbers throughout brief for consistency.	MMH	\$295	\$266
3/28/2016	1.1	Scan in letters and claim forms received from class members and save in case management system.	NMG	\$285	\$314
3/28/2016	0.3	Discuss weekly tasks with TAG; review itemized expenses and hours documents and discuss same with SS.	JLM	\$495	\$99

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/28/2016	0.5	Discuss calculating expenses with case team; update expense chart.	KMB	\$295	\$148
3/29/2016	2.3	Discuss with TAG re: call to clerk re: substitution of filing; call with former employee of IJL; discuss same with TAG; discuss correspondence with class members with TAG; review new objections and new voice mails from class members; review status from claims administrators; email exchange with claims administrators re: putting new documents on website.	SS	\$405	\$932
3/29/2016	4.3	Correspond with ECF clerk re: memorandum signature page and discuss same with SS; enter phone note for same; correspond with class members; continue drafting memorandum re: follow up correspondence; discuss next steps with SS; take notes on phone call with former IJL employee with SS.	TAG	\$285	\$1,226
3/30/2016	0.3	Review class members' correspondence and discuss with TAG re: returning calls.	SS	\$405	\$122
3/30/2016	0.9	Correspond with class member; download court-filed documents; continue drafting memorandum re: follow-up contact with class members; discuss preparing and sending courtesy copies to Judge Stein with SS.	TAG	\$285	\$257
3/30/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
3/31/2016	0.9	Review objections filled with Court; discuss correspondence with class member and her counsel with TAG; review courtesy copy of fees application and draft and edit transmittal letter.	SS	\$405	\$365
3/31/2016	5.4	Correspond with class members; discuss same with SS; continue drafting memorandum re: follow-up contact with class members; download court-filed documents; correspond with Work Product re: printing and binding of courtesy copies; enter phone notes for same; draft transmittal letter for courtesy copies; deliver courtesy copies to Judge Stein.	TAG	\$285	\$1,539

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/1/2016	1.9	Complete weekly update, organization, and review of case files; correspond with class members; discuss same with SS; enter phone notes for voicemails received from class members; continue drafting memorandum re: follow-up contact with class members; draft case plan memorandum.	TAG	\$285	\$542
4/1/2016	2.8	Review objections and discuss with JGB re: how to address each one; discuss with TAG re: preparing memorandum of responses for same; email exchange with opposing counsel re: fairness hearing and JIL's role at same; discuss correspondance with class members with TAG; correspond with class members re: various issues; research re: responses to objections.	SS	\$405	\$1,134
4/3/2016	0.7	Review and give thoughts on case summary memorandum; review materials in anticipation of fairness hearing	JGB	\$690	\$483
4/4/2016	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
4/4/2016	5.1	Correspond with class members; discuss same with SS; enter phone notes for voicemails received from class members; continue drafting memorandum re: follow-up contact with class members; discuss memorandum re: objections and responses with SS; discuss issue re: emailing a large voicemail file with VMF and MJN; upload documents to case management system.	TAG	\$285	\$1,454
4/4/2016	1.4	Research fairness hearing and find examples of recent fairness hearings to determine what should be expected	BLG	\$290	\$406

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/4/2016	3	Email exchange with class member's attorney re: opt-out form; call re: same; discuss with TAG re: following up with claims administrators re: same; review weekly status report re: notices; email exchange with opposing counsel re: fairness hearing; email exchange with opposing counsel re: correspondance with class members; discuss with BLG re: fairness hearing transcripts; review various transcripts in preparation for fairness hearing.	SS	\$405	\$1,215
4/5/2016	7.3	Correspond with class members; discuss same with SS; enter phone notes for voicemails received from class members; continue drafting memorandum re: follow-up contact with class members; take notes on SS phone call with class member; enter phone notes for same; upload documents to case management system; draft memorandum re: responses to objections and discuss same with SS.	TAG	\$285	\$2,081
4/5/2016	0.1	Discussed upcoming case tasks with TAG.	JMS	\$495	\$0
4/6/2016	9.4	Correspond with class members; discuss same with SS; continue drafting memorandum re: follow-up contact with class members; draft memorandum re: responses to objections and discuss same with SS; send monthly update to class members; review emails and phone notes for correspondence re: IJL's financials, transferring vouchers, and other topics; discuss same with SS; enter expense in case management system; line edit email to opposing counsel.	TAG	\$285	\$2,679
4/6/2016	0.2	Discuss status and next steps with TAG.	TJF	\$465	\$47
4/7/2016	0.3	Review motion to intervene and emailed case team re: same.	JGB	\$690	\$207
4/7/2016	0.1	Discuss next steps and contact with class members with TAG.	MWS	\$515	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/7/2016	6.9	Complete weekly update, organization, and review of case files; correspond with class members; discuss same with SS; continue drafting memorandum re: follow-up contact with class members; draft memorandum re: responses to objections and discuss same with SS; correspond with Heffler re: class member information; upload documents to case management system; enter expense in case management system.	TAG	\$285	\$1,967
4/8/2016	5.8	Review newly filed objections; discuss MOnday's return date with case team and email exchange re: same; call with ECF desk re: same; call with chambers re: same; email exchange with Court re: same; call with claims administrator re: declaration; opt-out forms and other details; email exchange with class members re: class definition; review her contract and reason for potential objection; email opposing counsel re: same; discuss same with JGB; review claims administrators list re: objectors' status; discuss with JGB re: drafting brief in support of final approval; research re: same; review examples of same received from claims administrators; email exchange with class members re: opting out and objections; email to case team re: next steps and plan; call with JGB re: same; email exchange and discussion with TAG and KMB re: calls with class members and responding to voice mails.	SS	\$405	\$2,349
4/8/2016	0.6	Phone call with ECF help desk and chambers re: recent filing; discuss next steps with SS; save, sort, and code phone notes into case management system; follow up with various class members.	KMB	\$295	\$177
4/9/2016	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
4/10/2016	3.4	Draft motion for final approval; review caselaw re: same; review objections memo and email case team re: plan on handling various objections.	SS	\$405	\$1,377
4/11/2016	0.4	Discuss settlement and objector issues with SS.	JGB	\$690	\$276

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/11/2016	6.3	Correspond with class members; discuss same with SS; continue drafting memorandum re: follow-up contact with class members; review and save to case management system articles about the action; download and review court-filed documents; enter expenses to case management system; draft brief in support of final approval; discuss same with SS.	TAG	\$285	\$1,796
4/11/2016	7.1	Review objections and discuss same with case team; email exchange with opposing counsel re: objections, financial statements, and final approval papers; edit and draft motion for final approval; review articles re: objections in case; discuss with TAG re: objections memorandum; call with class member's lawyer re: opt-out form; call with class member re: settlement terms; email exchange with claims administrator re: status of various class members.	SS	\$405	\$2,876
4/11/2016	0.1	Discuss next steps and objections with TAG.	MWS	\$515	\$0
4/12/2016	0.1	Discuss next steps and client contact with TAG.	MWS	\$515	\$0
4/12/2016	1.4	Review recently filed objection papers; discuss with SS.	JGB	\$690	\$966
4/12/2016	11.7	Draft brief in response to objections; research conflict of interests issues; research re: not having cy pres recipient identified in notice; call with claims administrators re: same; meet with TAG re: response to pro se objectors; review and edit same; meet with JGB re: same and discuss drafts; edit brief in support of final approval; email exchange with opposing counsel re: same and handling objectors; email to TAG and JGB re: drafts and next steps.	SS	\$405	\$4,739
4/12/2016	8.5	Enter expenses to case management system; review and download court-filed documents; upload documents to case management system; draft brief in response to objections; discuss same and brief in support of final approval with SS; review objections received by class members.	TAG	\$285	\$2,423

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/13/2016	1.2	Edit Heffler declaration; edit settlement briefs; discuss with SS.	JGB	\$690	\$828
4/13/2016	2.7	Discuss work on brief in response to objections with SS; draft sections of brief.	MMH	\$295	\$797
4/13/2016	5.2	Draft brief in support of final approval; discuss same and brief in response to objections with SS; review court-filed documents; upload documents to case management system; review and download article re: IJL; enter expenses in case management system; draft JGB and JLN declarations in support of final approval; discuss briefs and next steps with SS.	TAG	\$285	\$1,482
4/13/2016	12.8	Edit and draft brief in support of final approval; draft and edit response to objections; discuss research re: conflict of interest with BLG and review his email re: same; email to opposing counsel re: arguments for each objection; review invoices from claims administrators and email exchange with JGB and claims administrators re: same; review claims administrators' declaration; email exchange with JGB re: same; research re: cy pres recipient; review newly received objections.	SS	\$405	\$5,184
4/14/2016	0.3	Research redemption rates of vouchers	BLG	\$290	\$87
4/14/2016	8.4	Draft motion for final approval briefs; apply JGB's edits to same; download court-filed documents; draft memorandum memorializing objections; enter expense to case management system; upload documents to case management system.	TAG	\$285	\$2,394
4/14/2016	2.3	Review and edit briefs in support of final approval and in opposition to objectors.	JGB	\$690	\$1,587
4/14/2016	0.1	Discussed upcoming case tasks with TAG.	JMS	\$495	\$0
4/14/2016	1.4	Discuss nonprofit requirements with SS; research nonprofits for cy pres; draft list of nonprofits with description; send same to SS.	MMH	\$295	\$413

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/14/2016	13.2	Edit and draft motion in support of final approval and response to objections; research re: objectors and their previous objections; further research re: cy pres identity in notice requirement; discuss with MMH re: research on potential non-profit organizations as receipients of the residual sum; email exchange with opposing counsel re: same; email exchange with opposing counsel re: defendants' brief and financial declaration and filing it in camera; review JGB's edits and discuss same with him; review JLN declaration.	SS	\$405	\$5,346
4/15/2016	2.9	Review and provide edits for final approval papers and opposition to objection,	JGB	\$690	\$2,001
4/15/2016	8.7	Edit and draft papers in support of final approval; discuss same with TAG; call with claims administrators re: same; review and enter JGB's edits; discuss line edits with MMH and enter same.	SS	\$405	\$3,524
4/15/2016	3.3	Line edit memorandum of law in support of motion for final approval; assist with citing docket numbers of objections for use in memorandum of law in response to objections; line edit memorandum of law in response to objections; line edit JGB declaration in support of motions.	MMH	\$295	\$974
4/15/2016	9.9	Enter expenses to case management system; draft, revise, and apply JGB's edits to motions for final approval briefs; draft declarations and apply JGB's and JLN's edits to same; discuss drafting and filing with SS; download court-filed documents; draft memorandum memorializing objections; discuss same with MMH re: organizing objections by topic; file motions for final approval and supporting documents; email court-filed documents to opposing counsel.	TAG	\$285	\$2,822
4/15/2016	0.7	Create table of authorities for objections brief.	NMG	\$285	\$200
4/17/2016	0.1	Review and give thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/18/2016	8.3	Upload court-filed documents to case management system; draft argument memorandum for fairness hearing; draft memorandum re: objections; discuss memorandums and next steps with SS; correspond with class members; email case team re: electronic devices order and preparing iPad for fairness hearing; email Heffler re: class members' claims forms.	TAG	\$285	\$2,366
4/18/2016	0.2	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$138
4/18/2016	4.5	Prepare for fairness hearing	SS	\$405	\$1,823
4/18/2016	0.1	Discuss weekly tasks with TAG.	JLM	\$495	\$0
4/19/2016	11.4	Upload court-filed documents to case management system; draft argument memorandum for fairness hearing; draft memorandum re: objections; correspond with class members; continue drafting memorandum re: followup correspondence prepare iPad for fairness hearing and discuss same with MJN and KMB; upload documents to Dropbox and update same; update case summary memorandum; discuss memorandums and preparing for hearing with SS.	TAG	\$285	\$3,249
4/19/2016	0.8	Email case team re: courtesy copies and meeting with class representatives.	JGB	\$690	\$552
4/19/2016	0.1	Discuss status and next steps with TAG.	TJF	\$465	\$0
4/19/2016	3.2	Prepare for fairness hearing.	SS	\$405	\$1,296
4/19/2016	0.1	Discuss next steps and prep for fairness hearing with TAG.	MWS	\$515	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/20/2016	6.8	Draft argument memorandum for fairness hearing and discuss same with SS; enter expenses in case management system; draft direct examination scripts and discuss same with SS; upload documents to case management system; upload documents to Dropbox; draft objections memorandum; discuss printing and preparing documents for fairness hearing with SS.	TAG	\$285	\$1,938
4/20/2016	3.7	Prepare for fairness hearing; email exchange with JGB re: printing exhibits and examination transcript for class representatives; draft same and discuss it with TAG; review argument memorandum and discuss same with TAG; review objectors' memo and discuss same with TAG.	SS	\$405	\$1,499
4/21/2016	7.6	Draft objections memorandum and discuss same with SS; upload documents to Dropbox; upload documents to case management system; review Defendants' brief in support of final approval; correspond with Work Product to order printing of documents for fairness hearing; enter phone notes for same; organize Dropbox folder with documents for same; correspond with class members; take notes on calls with class representatives.	TAG	\$285	\$2,166
4/21/2016	1.7	Email exchange with class representatives re: call to prepare for fairness hearing; calls with class representatives re: same; discuss same with TAG; review defendant's brief in support of final approval and discuss same with case team.	SS	\$405	\$689

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/22/2016	6.9	Complete weekly update, organization, and review of case files; update case summary memorandum; draft direct scripts for class representatives; draft argument memorandum; upload documents to Dropbox; prepare JGB's iPad for fairness hearing; revise objections memorandum; upload documents to case management system; enter phone notes for voicemails from class members in case management system; export data from case management system and calculate number of total calls; discuss same with KMB; file supplemental Heffler declaration and discuss same with SS; draft case plan memorandum; discuss logistics and preparation for fairness hearing with SS.	TAG	\$285	\$1,967
4/22/2016	1.5	Review and give edits on argument memorandum and objections memorandum; email case team re: fairness hearing logistics and preparation.	JGB	\$690	\$1,035
4/22/2016	1.1	Meet with JGB re: preparation for fairness hearing; review dropbox and JGB' edits to argument memoranda; discuss printing with TAG; review Heffler affidavit; email exchange re: editing same; discuss filing of same with TAG.	SS	\$405	\$446
4/24/2016	0.7	Review and give thoughts on case summary memorandum; review argument memo in preparation for fairness hearing.	JGB	\$690	\$483
4/25/2016	1.8	Meet with class representatives to prepare for fairness hearing.	JGB	\$690	\$1,242
4/25/2016	0.1	Discuss next steps and fairness hearing with TAG.	MWS	\$515	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/25/2016	6.3	Meet with JGB re: preparing for fairness hearing; meet with class representatives and prepare them for hearing; review printed material and court file binders; discuss same with TAG; observe Southern District fairness hearing in preparation for fairness hearing; discuss same with JGB; review and brief important cases in advance of fairness hearing; email exchange with JLN re: fairness hearing and logistics.	SS	\$405	\$2,552
4/25/2016	8.9	Prepare for fairness hearing; print and organize documents; organize court file binder; draft argument memorandum and objections memorandum; draft memorandum re: Grinnell factors; take notes on meetings with class representatives; upload documents to Dropbox and case management system; discuss next steps and fairness hearing preparation with JGB and SS.	TAG	\$285	\$2,537
4/26/2016	5.1	Prepare for fairness hearing and meet with case team re: same; advocate for clients and the classes at fairness hearing.	JGB	\$690	\$3,519
4/26/2016	5.7	Prepare for fairness hearing with JGB; moot arguments and go over presentation with JGB; attend fairness hearing and assist with arguments; discuss same with JGB, JLN, and TAG; discuss with TAG re: further correspondence with class members and call with claims administrators re: same.	SS	\$405	\$2,309
4/26/2016	6.1	Prepare for and meet with case team re: fairness hearing; assist and take notes at fairness hearing; enter expenses in and upload documents to case management system.	TAG	\$285	\$1,739
4/27/2016	0.2	Review emails between TAG and claims administrators re: correspondence with class members.	SS	\$405	\$81

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/27/2016	1.2	Review voicemails from class members; correspond with Heffler re: fairness hearing and forwarding voicemails for Heffler to handle; enter phone note for same; discuss same with SS; send class member's claim form to Heffler; upload document to case management system.	TAG	\$285	\$342
4/28/2016	0.4	Discuss with TAG re: reimbursement for client's stay in New York for fairness hearing; discuss with TAG re: call with class member; review objection filed with Court.	SS	\$405	\$162
4/28/2016	4.7	Correspond with class member; discuss same with SS; correspond with Heffler re: calling class members; transfer phone notes from memorandum to case management system for voicemails and phone calls with class members.	TAG	\$285	\$1,340
4/29/2016	0.4	Email to case tema re: next steps; discuss with TAG re: calls with class members and phone notes re: same; schedule call with class members and review emails re: same.	SS	\$405	\$162
4/29/2016	0.1	Discuss next steps and communications with class members with TAG.	MWS	\$515	\$0
4/29/2016	0.8	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; correspond with Heffler re: voicemails; discuss next steps with SS; correspond with Millenium Hilton re: billing; enter phone note for same; correspond with class members.	TAG	\$285	\$228
5/1/2016	0.2	Email exchange with JGB re: plan for following weeks before Court issues decision; discuss call with class members.	SS	\$405	\$81
5/2/2016	0.5	Correspond with class members; discuss phone call with class member with SS; correspond with Heffler re: class member's status; upload document to case management system; discuss monthly update with SS and email JGB re: same.	TAG	\$285	\$143

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/2/2016	0.1	Discuss next steps and entering phone notes for correspondence with class members with TAG.	MWS	\$515	\$0
5/4/2016	0.7	Review transferring of notes into case management system; review correspondence with claims administrators re: responding to voice mails; review class members' correspondence and discuss same with TAG.	SS	\$405	\$284
5/4/2016	3.9	Correspond with class member; correspond with Heffler re: voicemails from class members; transfer phone notes from memorandum to case management system for voicemails and phone calls with class members.	TAG	\$285	\$1,112
5/5/2016	3.8	Correspond with class members; transfer phone notes from memorandum to case management system for voicemails and phone calls with class members; take notes on SS's call with class member; enter phone notes for same.	TAG	\$285	\$1,083
5/5/2016	0.9	Call with class member re: her situation and remedies; discuss same with TAG.	SS	\$405	\$365
5/6/2016	1	Complete weekly update, organization, and review of case files; draft monthly update and discuss with SS; enter phone notes for voicemails and calls from class members; correspond with class member; correspond with Heffler re: following up with class members.	TAG	\$285	\$285
5/9/2016	0.6	Discuss monthly update with SS; email JGB re: same; format and prepare monthly update for sending; email MJN re: MailChimp.	TAG	\$285	\$171
5/9/2016	0.5	Edit and draft monthly update language to class members; discuss same with TAG; review JGB's edits; discuss with TAG re: possible next steps and holding off on work unless necessary; review JLN's email re: fees calculation; email exchange re: same.	SS	\$405	\$203
5/9/2016	0.1	Review and edit monthly update email.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/10/2016	0.2	Correspond with class member; send monthly update email.	TAG	\$285	\$57
5/10/2016	0.2	Review correspondance from class members and with claims administrators.	SS	\$405	\$81
5/11/2016	0.5	Review JLM's email re: fees; review TAG's correspondance with claims administrators re: communication with class members; review media article and discuss same with TAG.	SS	\$405	\$203
5/11/2016	1	Correspond with class members; enter phone notes for call and voicemail from class members; correspond with Heffler re: returning call to class member; review and download news article re: action; upload to case management system; review emails between case team re: attorney's fees; update class mailing list.	TAG	\$285	\$285
5/12/2016	0.3	Correspond with class member; enter phone note for same.	TAG	\$285	\$86
5/13/2016	0.8	Review JGB's email re: attorney's fees analysis; complete weekly update, organization, and review of case files; review notes to determine Court's direction and discuss same with SS.	TAG	\$285	\$228
5/13/2016	0.7	Email exchange with JGB and JLN re: submission of letter re: calculation of attorneys' fees; review cases cited by JLN; review our prior submissions re: same.	SS	\$405	\$284
5/16/2016	0.2	Review emails from class members in response to monthly update.	SS	\$405	\$81
5/16/2016	0.5	Correspond with class members; enter phone note for voicemail from class member; email Heffler re: responding to class member.	TAG	\$285	\$143
5/17/2016	0.5	Enter phone notes for voicemails from class members; correspond with class member; email Heffler re: following up with class members.	TAG	\$285	\$143

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/18/2016	0.2	Email Heffler re: following up with voicemails from class members.	TAG	\$285	\$57
5/19/2016	0.9	Correspond with class member; enter phone notes for voicemails and call from class members; email Heffler re: following up with class members' voicemails.	TAG	\$285	\$257
5/19/2016	0.1	Touch base with administrator re: case status.	JGB	\$690	\$69
5/19/2016	0.6	Review invoice; email exchange with claims administrators re: same; review correspondance with class members; discuss invoice with JGB.	SS	\$405	\$243
5/20/2016	0.2	Review correspondance with class members and with claims administrators.	SS	\$405	\$81
5/20/2016	0.1	Complete weekly update, organization, and review of case files.	TAG	\$285	\$29
5/24/2016	0.2	Enter phone notes for voicemails from class members; email Heffler re: follow up to same.	TAG	\$285	\$57
5/26/2016	0.3	Complete weekly update, organization, and review of case files; update case summary memorandum; enter phone note for voicemail from class member; correspond with Heffler re: same.	TAG	\$285	\$86
5/31/2016	0.2	Discuss with TAG re: correspondance with class members; review monthly update language.	SS	\$405	\$81
5/31/2016	0.7	Enter phone notes for voicemails from class members; email Heffler re; responding to same; correspond with class member seeking referral; discuss same with SS; monthly review of documents, filings, contacts, and other summary and general case information.	TAG	\$285	\$200
6/1/2016	0.3	Enter phone note for voicemail from class member; email Heffler re: same; discuss deadline and monthly update with SS.	TAG	\$285	\$86

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/2/2016	0.2	Enter phone note for voicemail from class member; correspond with Heffler re: same.	TAG	\$285	\$57
6/3/2016	0.1	Complete weekly update, organization, and review of case files.	TAG	\$285	\$29
6/3/2016	0.3	Review correspondance with class members and with claims administrators re: claims and vouchers.	SS	\$405	\$122
6/7/2016	0.2	Correspond with class member; enter phone note for voicemail from class member and email Heffler re: responding to same.	TAG	\$285	\$57
6/7/2016	0.2	Review email exchange with class members re: vouchers.	SS	\$405	\$81
6/8/2016	0.3	Correspond with class member; email Heffler re: same; enter phone notes for same.	TAG	\$285	\$86
6/9/2016	0.2	Review email exchange between TAG and class members and claims administrators.	SS	\$405	\$81
6/10/2016	0.1	Complete weekly update, organization, and review of case files.	TAG	\$285	\$29
6/13/2016	0.2	Review statistics re: claims submission.	SS	\$405	\$81
6/13/2016	0.2	Review email from potential class member; discuss case status and statistics with SS.	TAG	\$285	\$57
6/14/2016	0.2	Correspond with class member; discuss same with SS.	TAG	\$285	\$57
6/15/2016	0.2	Review correspondance from class members.	SS	\$405	\$81
6/15/2016	0.1	Respond to class member's email; discuss same with SS.	TAG	\$285	\$29

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/17/2016	2.7	Complete weekly update, organization, and review of case files; correspond with class member; discuss same with SS; email Heffler re: responding to voicemail; enter phone note for voicemail from class member; conduct Westlaw research re: common fund settlements and cases re: attorney's fees; meet with case team to discuss attorney's fees, writing Court, and next steps.	TAG	\$285	\$770
6/17/2016	1.7	Email exchange with JLN re: meeting about writing to Court; meet with JLN and TAG re: same; call with class member re: update; discuss with JGB re: same.	SS	\$405	\$689
6/24/2016	0.2	Review email from Andrew Wolfe and email case team re: same.	SS	\$405	\$81
7/5/2016	0.6	Enter phone note for voicemail from class member; email Heffler re: responding to same; draft monthly update and email SS re: same.	TAG	\$285	\$171
7/5/2016	0.1	Discuss next steps and monthly update to clients with TAG.	MWS	\$515	\$0
7/6/2016	0.5	Enter phone notes for voicemails from class members; email Heffler re: same; review phone note for past correspondence with class member.	TAG	\$285	\$143
7/8/2016	0.3	Complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$285	\$86
7/13/2016	0.1	Discuss monthly update and drafting email to class representatives with SS.	TAG	\$285	\$29
7/14/2016	0.1	Review email inquiry and discuss with SS.	TAG	\$285	\$29
7/14/2016	0.7	Review final report re: claims submission; research re: same in similar matters.	SS	\$405	\$284
7/15/2016	0.1	Email exchange with SS re: responding to inquiry.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/15/2016	0.3	Discuss next steps with SS; draft email to class representatives.	TAG	\$285	\$86
7/15/2016	0.1	Discuss next steps and drafting update to class representatives with TAG.	MWS	\$515	\$0
7/16/2016	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
7/18/2016	0.1	Discuss next steps with case team.	JGB	\$690	\$69
7/18/2016	0.4	Discuss next steps with case team; correspond with class members; correspond with Heffler re: returning voicemail from class member and confirming claim submission for class member.	TAG	\$285	\$114
7/18/2016	0.8	Email exchange with JLN re: letter to Court; discuss same with JGB; review JGB's email re: next steps and plan; discuss with TAG re: correspondence with class members; review same.	SS	\$405	\$324
7/19/2016	0.2	Review email correspondence with claims administrators and with class members re: claims submission.	SS	\$405	\$81
7/19/2016	0.4	Correspond with Heffler and class member re: confirming claim submission; update case summary memorandum.	TAG	\$285	\$114
7/20/2016	0.5	Email exchange with JLN re: letter to Court; review same; discuss same with TAG; discuss correspondence with class members with TAG and review emails re: same.	SS	\$405	\$203
7/20/2016	0.1	Discuss common fund settlements and next steps with SS.	TAG	\$285	\$29
7/21/2016	3.5	Conduct Westlaw and outside research re: common fund settlements and attorney's fees; draft memorandum re: same; discuss same and next steps with SS; correspond with Heffler re: common fund settlements and enter phone note for same; discuss call with SS.	TAG	\$285	\$998

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/21/2016	0.8	Review JLN's draft of letter to Court; discuss distinguishing common fund case with TAG and call with claims administrators re: same.	SS	\$405	\$324
7/22/2016	1.3	Email class representatives re: status and next steps; email JLN re: comments on letter to Court and review caselaw cited in letter; discuss same with JGB.	SS	\$405	\$527
7/22/2016	0.4	Line edit emails to class representatives and case team; discuss update email and next steps with SS.	TAG	\$285	\$114
7/25/2016	0.2	Email case team re: meeting to discuss writing letter to Court.	JGB	\$690	\$138
7/25/2016	0.3	Enter phone note for voicemail from class member; correspond with Heffler re: responding to same; review and sort emails re: meeting to discuss letter to court.	TAG	\$285	\$86
7/25/2016	0.3	Review correspondance with class members; discuss same with TAG; email exchange re: meeting re: letter to Court.	SS	\$405	\$122
7/26/2016	0.3	Review email exchange between JGB and reporter; review correspondance with class members.	SS	\$405	\$122
7/27/2016	0.7	Email and discuss with SS writing letter to Court; correspond with and phone call with reporter re: matter.	JGB	\$690	\$483
7/27/2016	1.3	Email exchange with JGB re: content of letter to Court; review common fund cases and email JGB re: same; meet with JGB re: same; email exchange with JLN re: meeting.	SS	\$405	\$527
7/27/2016	0.2	Correspond with class member; enter phone note for JGB's conversation with reporter.	TAG	\$285	\$57
7/28/2016	0.2	Correspond with class member.	TAG	\$285	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/29/2016	0.6	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; correspond with Heffler re: responding to voicemails from class members; enter phone note for voicemail from class member; email SS re: call with case team re: writing to Court.	TAG	\$285	\$171
7/29/2016	0.3	Review email exchange re: meeting and call to discuss letter to Court.	SS	\$405	\$122
8/2/2016	0.2	Email exchange with class members; discuss same with TAG.	SS	\$405	\$81
8/2/2016	1.5	Draft and format letter to Court re: common fund; discuss same with SS; review and download articles re: adversary and settlement; correspond with class member; enter phone note for voicemail from class member; correspond with Heffler re: responding to same.	TAG	\$285	\$428
8/3/2016	0.1	Upload articles to case management system.	TAG	\$285	\$29
8/4/2016	0.7	Email exchange with case team re: letter to Court; review JGB's comments re: same; discuss same with TAG; edit monthly update to send to class members; discuss same with TAG.	SS	\$405	\$284
8/4/2016	0.9	Discuss sending monthly update to class members with SS; edit and send monthly update; edit and send to JGB the draft letter to the Court; discuss same with SS.	TAG	\$285	\$257
8/4/2016	0.1	Email exchange with case team re next steps.	JGB	\$690	\$69
8/4/2016	0.2	Line edit letter to Judge Stein.	MMH	\$295	\$59
8/5/2016	1.4	Email exchange with JLN and JGB re: letter to Court; draft and edit same and email JGB re: potential revision of same; draft another version of letter and same to JLN.	SS	\$405	\$567

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/5/2016	0.4	Correspond with class members; discuss same with SS; discuss drafting letter to Court re: attorney's fees with SS.	TAG	\$285	\$114
8/6/2016	0.1	Email case team re: client follow up.	JGB	\$690	\$69
8/8/2016	0.8	Email exchange with JGB re: letter to Court and authority cited in it; review correspondence from class members and discuss responses with TAG.	SS	\$405	\$324
8/8/2016	0.2	Email exchange with SS re: drafting letter to Court; email exchanges with class members.	JGB	\$690	\$138
8/8/2016	1.4	Correspond with class members; discuss same with SS; correspond with Heffler re: same; draft letter to court and discuss same with SS and MWS; complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$285	\$399
8/9/2016	1.6	Email exchange with JGB and JLN re: letter to Court; email to JLN re: authority in letter and research re: same; discuss same with TAG; discuss with TAG re: correspondence with class members.	SS	\$405	\$648
8/9/2016	0.7	Email case team re: drafting letter to court; review underlying authority; discuss status with partner.	JGB	\$690	\$483
8/9/2016	2	Correspond with class members; discuss same with SS; correspond with Heffler re: class members; draft letter to court and discuss same with SS.	TAG	\$285	\$570
8/10/2016	2.9	Edit and draft letter to Court; email exchange with JLN and JGB re: same; email exchange with class representatives re: status; discuss with TAG re: correspondence with class members and review same.	SS	\$405	\$1,175

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/10/2016	1.7	Revise letter and discuss with JLM and SS; prepare exhibit for filing; file letter and exhibit; review ECF rules and email ECF clerk re: filing error; discuss same with SS; correspond with class members; discuss same with SS; enter phone note for voicemail from class member; correspond with Heffler re: communication with class members.	TAG	\$285	\$485
8/10/2016	0.3	Review and provide thoughts on letter to court; email case team re: same.	JGB	\$690	\$207
8/10/2016	0.2	Edit letter to the Court regarding claim numbers and settlement.	JLM	\$495	\$99
8/11/2016	0.2	Discuss with TAG re: class members' correspondance.	SS	\$405	\$81
8/11/2016	0.2	Correspond with Heffler re: communication with class members and updating settlement website; discuss same with SS.	TAG	\$285	\$57
8/12/2016	0.1	Email and discuss with SS re: adding language to settlement website.	TAG	\$285	\$29
8/15/2016	0.5	Correspond with Heffler re: new language for website; discuss same with SS; upload documents to case management system; discuss corresponding with court re: filing error with SS.	TAG	\$285	\$143
8/15/2016	0.4	Edit language ot edit to website re: status of voucher distribution; email exchange with Heffler and opposing counsel re: same; discuss same with TAG.	SS	\$405	\$162
8/16/2016	0.5	Review and save relevant documents and opposing counsel's contact information to separate folder; discuss same with KMB.	TAG	\$285	\$143
8/19/2016	0.1	Correspond with class member; enter phone note for same.	TAG	\$285	\$29
8/22/2016	0.1	Review docket to ensure removal of incorrect filing entry.	TAG	\$285	\$29

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/26/2016	0.1	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum.	TAG	\$285	\$29
9/6/2016	0.7	Enter phone notes for voicemails; correspond with Heffler re: responding to voicemails from class members; upload document to case management system.	TAG	\$310	\$217
9/7/2016	0.5	Correspond with Heffler re: responding to voicemails; correspond with interested class member; enter phone note for same; email case team re: same.	TAG	\$310	\$155
9/15/2016	0.1	Enter phone note for voicemail from class member; email Heffler re: same.	TAG	\$310	\$31
9/16/2016	0.1	Complete weekly update, organization, and review of case files.	TAG	\$310	\$31
9/19/2016	0.2	Discuss case status and next steps with SS.	TAG	\$310	\$62
9/28/2016	0.1	Enter phone note for voicemail from class member; email Heffler re: responding to same.	TAG	\$310	\$31
9/29/2016	0.1	Discuss with JLN re: next steps and decision on motion for final approval over phone.	SS	\$470	\$47
9/30/2016	0.1	Review monthly update to class members language from TAG.	SS	\$470	\$47
9/30/2016	0.2	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; draft monthly update to class members.	TAG	\$310	\$62
10/3/2016	0.2	Enter phone note for voicemail from potential class member; email Heffler re: responding to same.	TAG	\$310	\$62
10/4/2016	0.1	Enter phone note for voicemail from potential class member; email Heffler re: responding to same.	TAG	\$310	\$31

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/6/2016	0.2	Email exchange with class member re: status of settlement.	SS	\$470	\$94
10/6/2016	0.2	Send monthly update; correspond with class member.	TAG	\$310	\$62
10/7/2016	0.2	Complete weekly update, organization, and review of case files; send monthly update email; correspond with class members.	TAG	\$310	\$62
10/17/2016	0.3	Enter phone notes for voicemails from class members; correspond with Heffler re: responding to voicemails; discuss case status and next steps with SS.	TAG	\$310	\$93
10/19/2016	0.2	Respond to inquiry about action; discuss same with SS.	TAG	\$310	\$62
10/21/2016	0.1	Complete weekly update, organization, and review of case files; email Heffler re: responding to voicemails.	TAG	\$310	\$31
10/30/2016	0.1	Provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/31/2016	0.5	Monthly review of documents, filings, contacts, and other summary and general case information; draft monthly update; enter phone notes for voicemails from class members; email Heffler re: responding to same.	TAG	\$310	\$155
11/1/2016	0.3	Review email exchange and other communication with class members and with claims administrator.	SS	\$470	\$141
11/1/2016	0.3	Send monthly update email; correspond with Heffler re: late claims and communications with class members.	TAG	\$310	\$93
11/6/2016	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/7/2016	0.1	Enter phone note for voicemail from class member; correspond with Heffler re: responding to same.	TAG	\$310	\$31
11/7/2016	0.3	Email to JGB re: how to proceed with action and writing to Court; review correspondence with class members and claim administrators.	SS	\$470	\$141
11/8/2016	0.1	Enter phone note for voicemail from class member; email Heffler re: same.	TAG	\$310	\$31
11/11/2016	1.3	Email exchange with case team re: opposing counsel's letter to Court re: vouceher distribution dates; email exchange with case team re: same; review timing of past decisions and determine best potential time for opposing counsel to submit letter and email opposing counsel re: same.	SS	\$470	\$611
11/16/2016	0.6	Enter phone notes for voicemails re: inquiries; correspond with individual inquiring about matter; correspond with Heffler re: same; discuss same with SS.	TAG	\$310	\$186
11/16/2016	0.2	Exchange emails and discuss with TAG re: correspondance with IJL customer who is not class member.	SS	\$470	\$94
11/17/2016	0.2	Review email exchnage between TAG and IJL's customer; discuss response to same with TAG.	SS	\$470	\$94
11/18/2016	0.1	Complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$310	\$31
11/22/2016	0.2	Enter phone note for voicemail inquiry; correspond with Heffler re: responding to same.	TAG	\$310	\$62
11/30/2016	0.1	Monthly review of documents, filings, contacts, and other summary and general case information; draft monthly update.	TAG	\$310	\$31

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/1/2016	0.5	Review update language to class members re: status of settlement; discuss same with TAG; discuss class members' correspondence re: same; review same.	SS	\$470	\$235
12/1/2016	0.3	Send monthly update email; correspond with class member.	TAG	\$310	\$93
12/2/2016	0.3	Email exchange and discussion with TAG re: class member's request for late claim submission.	SS	\$470	\$141
12/2/2016	0.2	Complete weekly update, organization, and review of case files; enter phone note for voicemail from class member; email SS re: same.	TAG	\$310	\$62
12/7/2016	0.1	Return call from class member; enter phone note for same.	TAG	\$310	\$31
12/9/2016	0.1	Complete weekly update, organization, and review of case files.	TAG	\$310	\$31
12/19/2016	0.7	Review emails from class member; discuss response with SS and email JGB re: same; correspond with class member; enter phone note for same.	TAG	\$310	\$217
12/19/2016	0.2	Discuss with TAG re: email from class member re: potential Nassau County matter; review email exchange re: same.	SS	\$470	\$94
12/20/2016	0.5	Email class member re: inquiry; discuss email with SS; enter phone note for voicemail; correspond with Heffler re: voicemail from class member.	TAG	\$310	\$155
12/20/2016	0.2	Email exchange with class member re: declination of representation in individual matter.	SS	\$470	\$94
12/21/2016	0.2	Correspond with Heffler re: case status and returning voicemail of class member; email class member re: inquiry and discuss same with SS.	TAG	\$310	\$62

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/21/2016	0.2	Further email exchange with class member re: declination of representaiton in individual matter.	SS	\$470	\$94
12/22/2016	0.3	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum.	TAG	\$310	\$93
12/23/2016	0.4	Email exchange with MJN and TAG re: call from class member; review same; email case team re: next steps and plan.	SS	\$470	\$188
1/3/2017	0.4	Discuss with TAG responding to class members inquiries; review same.	SS	\$470	\$188
1/3/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
1/3/2017	0.6	Enter phone notes for voicemails from class members and other inquiries; correspond with Heffler re: responding to voicemails and renewing settlement PO box; email SS re: responding to new inquiries.	TAG	\$310	\$186
1/5/2017	0.2	Discuss responding to inquiries with SS; email Heffler re: renewing PO box.	TAG	\$310	\$62
1/6/2017	0.2	Complete weekly update, organization, and review of case files; discuss returning calls with SS.	TAG	\$310	\$62
1/10/2017	0.2	Return calls and enter voicemails for same.	TAG	\$310	\$62
1/11/2017	0.4	Enter phone note for voicemail from class member; correspond with Heffler re: responding to same; review court-filed letter; upload document to Dropbox and case management system.	TAG	\$310	\$124
1/11/2017	0.2	Review letter to Court from opposing counsel re: timing of decision.	SS	\$470	\$94

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/13/2017	0.4	Complete weekly update, organization, and review of case files; update case summary memorandum; draft monthly update.	TAG	\$310	\$124
1/17/2017	0.4	Discuss monthly update with SS; email JGB re: same; send monthly update to class members.	TAG	\$310	\$124
1/17/2017	0.3	Edit language for monthly update to clients; email exchnage with TAG and JGB re: same.	SS	\$470	\$141
1/20/2017	0.2	Complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$310	\$62
1/27/2017	0.2	Complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$310	\$62
1/31/2017	0.1	Monthly review of documents, filings, contacts, and other summary and general case information.	TAG	\$310	\$31
2/1/2017	0.4	Correspond with class member; enter phone note for same; discuss same with SS; add entry to mailing list; draft monthly update newsletter.	TAG	\$310	\$124
2/2/2017	0.2	Discuss with TAG re: class member's phone call and monthly update to class members.	SS	\$470	\$94
2/3/2017	0.1	Complete weekly update, organization, and review of case files.	TAG	\$310	\$31
2/3/2017	0.2	Email TAG re: language to send to class members as monthly update.	SS	\$470	\$94
2/7/2017	0.1	Review monthly update to class members.	SS	\$470	\$47
2/7/2017	0.2	Send monthly update email.	TAG	\$310	\$62
2/16/2017	0.2	Review messages from class members.	SS	\$470	\$94
2/17/2017	0.2	Complete weekly update, organization, and review of case files; update case summary memorandum.	TAG	\$310	\$62

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/22/2017	0.4	Review voice mail from class member and discuss with TAG re: how to proceed; review email exchange with administrator re: same.	SS	\$470	\$188
2/22/2017	0.6	Correspond with Heffler re: responding to class member; correspond with class member; discuss same with SS; enter phone notes for correspondence with class member.	TAG	\$310	\$186
2/23/2017	0.1	Review email exchange with class member.	SS	\$470	\$47
2/23/2017	0.3	Correspond with class member.	TAG	\$310	\$93
2/27/2017	0.2	Enter phone note for voicemail from class member; correspond with Heffler re: responding to voicemail.	TAG	\$310	\$62
2/28/2017	0.1	Review JGB's email re: following up with class members.	SS	\$470	\$47
2/28/2017	0.2	Discuss drafting transition memorandum with SS; monthly review of documents, filings, contacts, and other summary and general case information.	TAG	\$310	\$62
3/1/2017	0.1	Email SS re: corresponding with attorney inquiring about matter.	JGB	\$690	\$69
3/1/2017	0.4	Call to attorney handling similar case re: class waiver; email exchange with JGB re: same; discuss same with TAG.	SS	\$470	\$188
3/1/2017	0.4	Take notes on call with attorney; enter phone note for same; discuss same with SS.	TAG	\$310	\$124
3/2/2017	0.2	Review emails from Court and opposing counsel; discuss same with TAG.	SS	\$470	\$94
3/2/2017	0.2	Review emails from court and opposing counsel; discuss same with SS.	TAG	\$310	\$62
3/3/2017	0.3	Email case team re: next steps and plan; review JGB's email re: same; review Court order re: conference.	SS	\$470	\$141

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/3/2017	0.6	Review order from court; upload document to case management system; create event entries in case management system and firm calendar; complete weekly update, organization, and review of case files; discuss next steps with SS; update case summary memorandum.	TAG	\$310	\$186
3/6/2017	0.6	Enter phone note for voicemail from class member; correspond with Heffler re: responding to same voicemail; correspond with Heffler re: upcoming court conference; discuss same with SS; prepare proposed electronic device order; email Court re: same.	TAG	\$310	\$186
3/6/2017	0.2	Review and provide thoughts on case plan memorandum; discuss court appearance with SS	JGB	\$690	\$138
3/6/2017	0.5	Discuss hearing with JGB; review electronic devices application and discuss same with TAG; email exchange with claims administrators re: hearing.	SS	\$470	\$235
3/7/2017	0.4	Upload documents to Dropbox; review court-filed document and upload to case management system; correspond with Heffler re: responding to class members' inquiries.	TAG	\$310	\$124
3/7/2017	0.2	Review Court order re: electronic devices; review email from claims administrator re: communication with class members.	SS	\$470	\$94
3/10/2017	3.3	Prepare for court appearance; take notes at court appearance; complete weekly update, organization, and review of case file; update case summary memorandum; create events entries in calendar and case management system for upcoming deadlines and appearances; upload document to case management system and Dropbox.	TAG	\$310	\$1,023
3/10/2017	1.6	Make court appearance on behalf of class; discuss next steps with case team.	JGB	\$690	\$1,104

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/10/2017	2.8	Prepar for court appearance and exchange emails with case team re: same; attend conference and discuss decision and potential trial with case team; discuss same with JGB.	SS	\$470	\$1,316
3/12/2017	2.1	Review court filings re: denial of settlement and schedule; draft email language to sent to client re: update; draft language to send to media re: same; review email exchange with JLN re: joining parties; review past attempts to do same.	SS	\$470	\$987
3/13/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
3/13/2017	3.6	Edit email to class members re: decision and discuss same with TAG; discuss with MJN re: setting up separate number for notice; review notice and forward same with additional note to class representatives; review correwspondance from class members; discuss next steps with JGB; review emails from JLN re: call and next steps; review memoranda and previous email exchange re: adding additional party; email to claims administrators re: decision; email JGB re: next steps analysis; review and forward to JGB email re: bankruptcy counsel.	SS	\$470	\$1,692
3/13/2017	1.9	Discuss next steps with SS; purchase MailChimp credits and discuss same with MJN; line edit and send monthly update email to class members; review emails from class members; scan notes from court appearance; discuss transcript with SS; order transcript of court appearance.	TAG	\$310	\$589
3/13/2017	0.1	Discuss case status and next steps with TAG.	MWS	\$585	\$0
3/14/2017	1.1	Meet with JGB re: case transition and general next steps; start preparing transition email with tasks for next two months.	SS	\$470	\$517
3/15/2017	0.8	Exchange emails with class administrator; email case team re: next steps; discuss next steps with SS.	JGB	\$690	\$552

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/15/2017	2.8	Review media articles re: settlement and discuss same with TAG; discuss next steps in general with TAG; review correspondance with class members and discuss responding to same with TAG; discuss with TAG re: ordering transcript; email JLN re: analysis of next steps and how to proceed; email exchange with JLN and JGB re: joinder; research same.	SS	\$470	\$1,316
3/15/2017	1.8	Draft events entry for court appearance; discuss next steps with SS; enter phone note for voicemail from class member; discuss responding to class members with SS; conduct Google search re: articles about action; email SS re: same; save websites and upload documents to case management system; order transcript of hearing.	TAG	\$310	\$558
3/16/2017	2.7	Review case plan memoranda from previous trial matters; draft memorandum re: next steps preceding trial; discuss same with SS and KMB; discuss corresponding with class members with SS; call class member and enter phone note for same; complete weekly update, organization, and review of case files; review and sort emails; review article re: decision; save articles and upload documents to case management system.	TAG	\$310	\$837
3/16/2017	0.2	Email SS re: responding to class members.	JGB	\$690	\$138
3/16/2017	4.3	Email exchange with JGB and JLN re: setting u call to discuss next steps; email exchange with JGB re: responding to class members' inquiries; respond to same and discuss same with TAG; email exchange with bankruptcy counsel re: case in general and scheduling call to discuss same; research re: options in bankruptcy; review Law360 article re: settlement; meet with KMB and TAG re: case plan through trial; review same; review email exchange re: setting up case team meeting and seeking additional time to file motions.	SS	\$470	\$2,021
3/16/2017	0.3	Telephone conference with JGB re: delaying Motion filing date.	JLN	\$710	\$213

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/16/2017	0.2	Discuss case status and next steps with SS.	KMB	\$310	\$62
3/17/2017	0.9	Email case team re: next steps and plan; review motion for extension of time; review orders re: same; email exchange with JGB re: conference date; review correspondance with class members.	SS	\$470	\$423
3/17/2017	0.1	Reviewed and edited letter for extension.	JLN	\$710	\$71
3/20/2017	0.8	Email SS re: next steps; discuss with SS next steps and whether to seek joinder or sue Riverside; discuss bankruptcy issues with SS.	JGB	\$690	\$552
3/20/2017	1.8	Email case team re: follow up to call with bankruptcy attorney; email exchange with JGB re: same; discuss next steps in general with JLM; review class members' correspondance; email JLN re: analysis of various ways to proceed; email exchange re: letter to Court re: Rule 21; review same; review email exchange with opposing counsel re: scheduling call.	SS	\$470	\$846
3/20/2017	0.1	Discuss case status and weekly tasks with TAG.	JLM	\$565	\$0
3/20/2017	0.9	Discuss next steps with SS; upload court-filed documents to case management system; search SDNY website for judge's pretrial order; review and save judge's updated rules.	TAG	\$310	\$279
3/20/2017	2.7	Drafted letter to Judge Stein re: adding Riverside as a party; email exchange with JGB and SS re: Riverside Motion.	JLN	\$710	\$1,917
3/21/2017	1.3	Email opposing counsel re: scheduling; email case team re: conference date and updating class representative's contact information; email case team re: next steps; review joinder authority.	JGB	\$690	\$897

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/21/2017	3.7	Research re: potential settlement; review recent settlements approved by Judge Stein; email exchange with JLN re: motion to join mandatory party; research re: same; review cases cited in letter and email case team re: application of same; research other relevant authority; email exchange with case team re: correspondance with class members.	SS	\$470	\$1,739
3/21/2017	1.3	Review and summarize cases regarding joinder; research joinder issues and discuss with case team; meet with JGB to discuss next steps; review weekly plan email.	JLM	\$565	\$735
3/21/2017	0.9	Review documents and discuss with SS memorandum re: judge's decisions; discuss next steps with SS; update class representatives contact information in case management system; review and sort emails; review judge's order re: conference date.	TAG	\$310	\$279
3/22/2017	1.2	Research class action settlement percent of alleged damages and draft email to SS with findings and explanations of cases; research joinder of parties and redlined complaint.	BLG	\$390	\$468
3/22/2017	2.2	Take notes at case team meeting re: next steps; enter phone note for voicemail from class member; email JGB re: same; correspond with class member; email SS re: same; discuss next steps and researching Judge Stein's past decisions with SS and BLG; enter expenses in case management system; review hearing transcript and email to case team; upload document to case management system.	TAG	\$310	\$682
3/22/2017	1.2	Review transcript and order regarding settlement; meet with case team to discuss joinder and trial preparation; review plan email.	JLM	\$565	\$678

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/22/2017	3.1	Review Court's prior settlement and determine percentage of alleged damages; discuss same with JGB; meet with case team to discuss next steps; discuss with BLG re: Rule 21 requirements for redlined complaint.	SS	\$470	\$1,457
3/22/2017	2.1	Meet with case team re: joinder of Riverside; further review of authority regarding joinder and discussion with case team; review prior evidence re: Riverside involvement.	JGB	\$690	\$1,449
3/22/2017	0.5	Meeting with JGB, SS and rest of team re: Riverside letter brief.	JLN	\$710	\$355
3/23/2017	1.7	Discuss next steps and potential settlement with opposing counsel; discuss next steps with case team; relevant authority.	JGB	\$690	\$1,173
3/23/2017	2.3	Call with opposing counsel re: settlement and next steps; discuss same with case team; discuss joinder brief with case team and review first draft of same; email exchange with JLN and JGB re: editing and drafting same.	SS	\$470	\$1,081
3/23/2017	0.8	Discuss case status and weekly tasks with TAG; participate in call with opposing counsel regarding settlement; discuss same with case team.	JLM	\$565	\$396
3/23/2017	1	Take notes on call with opposing counsel; meet with case team to discuss next steps; review draft joinder brief; draft notice of motion for same; discuss brief and next steps with SS; upload documents to case management system.	TAG	\$310	\$310
3/23/2017	8.4	Drafted Memo of Law seeking to join Riverside; multiple edits and revisions to same.	JLN	\$710	\$5,964

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/24/2017	7.4	Edit and draft motion to join defendant; discuss same with JGB and insert JGB's edits; email exchange with JLN re: adding additional section; edit same; draft and edit JGB's declaration; email exchange with JGB re: same; cite check brief and discuss same with TAG; discuss line edits with NMG; discuss general edits with MWS and incorporate same; email exchange with opposing counsel re: remaining balance from claim processor; email exchange re: same with JGB and JLN; review response from claims administrators; edit notice of motion and supervise filing of related documents; discuss service with TAG; email to outside counsel re: same; review documents and other evidence re: Riverside's involvement in defendant's conduct.	SS	\$470	\$3,478
3/24/2017	1.6	Discuss case status and daily tasks with TAG; review joinder motion; review correspondence regarding same; discuss same with case team.	JLM	\$565	\$848
3/24/2017	0.4	Draft notice of appearance for JLM; finalize and file notice of appearance with the Court.	KMB	\$310	\$124
3/24/2017	6.8	Review files re: transcript of fairness hearing; review and sort emails; apply edits to joinder brief; create and format table of authorities in brief; prepare declaration for same; discuss drafting, formatting, filing, and service with SS; discuss line edits with NMG and SS; file joinder brief and supplemental documents; review and download court-filed documents; serve court-filed documents on opposing counsel.	TAG	\$310	\$2,108
3/24/2017	1	Line edit motion to join defendant in action and JGB declaration in support of motion; discuss same with SS and TAG.	NMG	\$310	\$310
3/24/2017	2.3	Review and edit brief and declaration in support of motion to join defendant; email case team re: edits, next steps, supporting documents and exhibits, serving new defendant, and corresponding with opposing counsel; email JLM re: filing a notice of appearance.	JGB	\$690	\$1,587

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/25/2017	3.4	Legal research re: relation back argument under state and federal law.	JLN	\$710	\$2,414
3/26/2017	2.6	Research re: continuous violation doctrine as possible basis for extending statute of limitations to include Riverside.	JLN	\$710	\$1,846
3/27/2017	3.8	Prepare and submit courtesy copies to SDNY; begin drafting evidence table; discuss next steps and preparing for trial with SS; enter phone note for voicemail inquiry; review JGB's case plan memorandum with SS; call opposing counsel and prepare documents for shipping to same; review and sort emails; email JGB and court reporters re: ordering transcript; discuss same with SS; enter expenses in case management system; begin drafting transition memorandum; discuss same with JLM; review and download updated docket.	TAG	\$310	\$1,178
3/27/2017	1.4	Email exchange with case team re: service on Mark Seiden and proposed filing deadline extension; email TAG re: transcript; email case team detailed case plan and trial prep memorandum; discuss general trial prep with SS.	JGB	\$690	\$966
3/27/2017	0.4	Discuss case status and weekly tasks with TAG; review weekly plan email and discuss upcoming tasks with SS.	JLM	\$565	\$226
3/27/2017	0.2	Review case plan memorandum.	KMB	\$310	\$62
3/27/2017	5.3	Review JGB's email re: trial preparation and next steps; meet with TAG re: same; discuss with JLM re: scheduling meeting about same; discuss trial preparation with JGB; begin drafting evidence tables and edit same; email exchange with opposing counsel and with case team re: additional time to oppose our joinder motions; discuss same with JGB; email exchange with case team re: service on Riverside and email exchange with Riverside's counsel re: same; discuss same with TAG.	SS	\$470	\$2,491

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/27/2017	0.3	Email exchange with JGB re: securing Marc Seiden and ensuring Riverside is directly served.	JLN	\$710	\$213
3/27/2017	0.1	Discuss case and next steps with JLM.	NMG	\$310	\$31
3/28/2017	3.7	Email exchange with JLN re: clarifying adjournment consent; email exchange with opposing counsle re: same; review motion for extension and Court's subsequent correspondance; discuss with TAG re: trial preparation and elements of claims; review briefings and discuovery re: same.	SS	\$470	\$1,739
3/28/2017	0.4	Email TAG re: SDNY ECF settings; forward clerk's email re: Defendants' extension request to case team.	JGB	\$690	\$276
3/28/2017	0.1	Discuss case status and next steps with TAG.	MWS	\$585	\$0
3/28/2017	6.4	Draft and format evidence table; conduct Westlaw research re: same; discuss same with SS; conduct Westlaw research re: authorities; draft memorandum of summary of authorities; return inquiry call.	TAG	\$310	\$1,984
3/28/2017	0.3	Email exchange with team re: service on Riverside and following up with Shapiro re: briefing schedule changes.	JLN	\$710	\$213
3/29/2017	2.7	Discuss JLN's hours with TAG; prepare for trial by reviewing evidence table status and memorandum of summary of authorities; email exchnage with TAG re: submission of courtesy copies after reply brief and request for oral arguments.	SS	\$470	\$1,269
3/29/2017	6.7	Draft motion memorandum for joinder motion; set up and format argument memorandum for joinder motion; conduct Westlaw research and draft memorandum of summary of authorities for joinder motion; discuss next steps and preparation for trial and pretrial conference with SS; review judge's rules and notes from conference; email SS re: same.	TAG	\$310	\$2,077

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/30/2017	2.1	Discuss with TAG re: argument memorandum and cases summary memorandum; review same; reiew TAG's email re: updated court rules; review discovery re: preparing for trial; review email exchange with third-party's counsel re: adjourning conference.	SS	\$470	\$987
3/30/2017	0.6	Discuss case status and weekly tasks with TAG; review corresopndence and plan emails; review joinder motion and issues.	JLM	\$565	\$283
3/30/2017	4.8	Conduct Westlaw research and draft memorandum of summary of authorities; draft argument memorandum for joinder motion; monthly review of documents, filings, contacts, and other summary and general case information.	TAG	\$310	\$1,488
3/31/2017	0.2	Meet with case team re: case status and next steps.	KMB	\$310	\$62
3/31/2017	0.4	Meet with case team re: case status and next steps; email exchanges with adversaries re conference and briefing.	JGB	\$690	\$276
3/31/2017	1.7	Email exchange with claims administor and opposing counsel rE: scheduling call; review exchange with Riverside's counsel re: conference adjournment; discuss smae with JGB; meet with case team re: preparing for trial; email case team re: next steps; review material in preparation for trial per JGB's email.	SS	\$470	\$799
3/31/2017	0.6	Meet with case team to discuss reply arguments and upcoming court appearance; email TAG re: witnesses.	JGB	\$690	\$414
3/31/2017	1.7	Review articles regarding class action trials; discuss same with case team; meet with case team to discuss trial preparation and next steps; review correspondence regarding scheduling and joinder issues.	JLM	\$565	\$961
4/1/2017	0.3	Review case summary memorandum	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/2/2017	0.3	Discuss case status and next steps with partner.	JGB	\$690	\$207
4/3/2017	4.9	Review and edit evidence table and witness list; research re: same and discuss same with TAG; general trial preparation and email exchange with JGB re: same.	SS	\$470	\$2,303
4/3/2017	0.6	Review and provide thoughts on case plan memorandum; email JLN re: drafting reply to joinder motion; review joinder papers.	JGB	\$690	\$414
4/3/2017	0.8	Discuss case status and next steps with TAG; review filings regarding joinder briefing schedule and pre-trial conference and discuss same with case team; correspond with opposing counsel regarding joinder briefing schedule; discuss same with JGB.	JLM	\$565	\$452
4/3/2017	0.1	Review case plan memorandum.	KMB	\$310	\$31
4/3/2017	7.9	Discuss next steps, drafting evidence table, witness list, reviewing documents, filing deadlines, and other trial preparation with SS; review documents and draft witness list; upload documents to case management system; review court-filed documents; revise calendar and event entries in case management system; review and sort emails; enter JLN's hours for March; email MJN re: same; enter expenses in case management system; save documents in Dropbox; review and save transcript of court appearance; review documents and draft evidence table.	TAG	\$310	\$2,449
4/4/2017	7.2	Review discovery documents re: preparing witness list and evidence table; meet with TAG re: same; email exchange with JLN re: documents supporting Riverside's involvement; discuss reply brief with TAG.	SS	\$470	\$3,384

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/4/2017	2.3	Draft case plan memorandum; email case team re: drafting reply brief, preparing for trial, joinder argument, and next steps; discuss hearing and case strategy with JLN.	JGB	\$690	\$1,587
4/4/2017	0.3	T/c with JB re: taking lead on reply briefs for joinder motion.	JLN	\$890	\$267
4/4/2017	9.6	Review documents and draft evidence table; email JLN re: supporting documents; review and sort emails; discuss reply brief work with SS; update potential witness list; discuss next steps, evidence table, and witness list with SS; review case management system and download court-filed documents; save court-filed documents in Dropbox.	TAG	\$310	\$2,976
4/4/2017	0.1	Discuss case status and next steps with TAG.	MWS	\$585	\$0
4/5/2017	6.4	Review opposition brief; research re: same; discuss same with JGB; meet with TAG re: trial preparation and communication with class members; draft correspondence re: same; review argument memorandum and case summary memorandum and edit same.	SS	\$470	\$3,008
4/5/2017	1.5	Email TAG re: electronic devices order; email case team re: next steps and plan for drafting reply brief; email SS re: argument memorandum.	JGB	\$690	\$1,035
4/5/2017	0.5	Read Riverside's opposition to joinder; notes re: same; sent email to JB regard: taking lead on reply briefs	JLN	\$890	\$445

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/5/2017	9.4	Review opposition brief and discuss same with SS; review emails from JGB; review documents and draft argument memorandum; discuss same with SS; invite case team members to Dropbox folder; complete and submit electronic devices order; email court re: same; enter expense in case management system; review and sort emails; add witnesses to memorandum with witness lists; discuss same with SS; upload documents to case management system; review case management system and download court-filed documents; save court-filed documents in Dropbox.	TAG	\$310	\$2,914
4/6/2017	7.7	Email exchange with case team re: analysis of Riverside's opposition brief and arguments to make on reply; draft table of content for reply brief and send same to JGB; edit same per JGB's edits; email exchange with case team re: hearing preparation; review IJL's brief and discuss same with case team; email exchange re: same; conference call with claims administrators and opposing counsel re: how to proceed; email potential witnesses re: their trial availability; discuss same with TAG and JGB; email JGB re: same.	SS	\$470	\$3,619
4/6/2017	1.2	Email case team re: drafting reply brief and next steps; review and edit reply brief.	JGB	\$690	\$828
4/6/2017	0.9	Discuss daily tasks and case status with TAG; review IJL opposition to joinder motion and discuss with case team; discuss preparation for pre-trial conference with case team; review correspondence with witnesses.	JLM	\$565	\$452

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/6/2017	11.4	Enter expenses in case management system; upload documents to case management system; review docket and download documents to Dropbox; email class representatives re: trial dates; discuss same with SS; review and sort emails; enter phone note for voicemail from class member; take notes on call with class administrator; review opposition briefs; draft argument memorandum; update motion memorandum; convert witness list into chart and insert into argument memoranda and evidence table; discuss same with SS; review firm calendar and compile attorneys' bad dates for trial scheduling purposes; draft memorandum of summary of authorities; discuss next steps with JLM.	TAG	\$310	\$3,534
4/6/2017	3.8	Started research for reply brief; cont'd research for reply brief.	JLN	\$890	\$3,382
4/7/2017	5.9	Email exchange re: voice mail from class member in Texas; call with class member re: her experience with defendant; email JLM re: plan email; email exchange with JGB and TAG re: witness availability; discuss with TAG re: editing witness list and creating table to include in argument memo; meet with case team re: drafting reply brief and argument preparation and strategy; review and edit reply brief.	SS	\$470	\$2,773
4/7/2017	1.1	Review briefs opposing joinder; meet with case team to prepare for pre-trial conference; discuss issues regarding same with JGB.	JLM	\$565	\$622
4/7/2017	2.2	Review opposing papers; discuss response with case team; review authority.	JGB	\$690	\$1,518

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/7/2017	6.3	Complete weekly update, organization, and review of case files; update case summary memorandum; enter phone notes for voicemails to and from class member; draft argument memorandum; discuss same with SS; draft memorandum of summary of authorities; correspond with class representatives re: unavailability for trial; enter phone notes for same; email case team re: same; take notes at case team meeting; enter expenses in case management system; format joinder reply brief.	TAG	\$310	\$1,953
4/7/2017	4.8	Cont'd research for reply brief.	JLN	\$890	\$4,272
4/7/2017	0.1	Discuss case status and next steps with TAG.	MWS	\$585	\$0
4/8/2017	3.7	Edit reply brief; research re: same; email same to JGB for edits.	SS	\$470	\$1,739
4/8/2017	1.2	Edit joinder papers; discuss same with case team.	JLM	\$565	\$678
4/8/2017	12.1	Finished research for reply brief on joinder motion; drafted section 1 of reply brief on joinder motion; drafted section 2 - relation back; drafted point III - no prejudice.	JLN	\$890	\$10,769
4/9/2017	7.7	Edit and draft reply brief; review JGB's edits and insert same; research re: various arguments; insert JGB's and JLN's edits; call with JLN re: order of arguments; supervise filing of brief; discuss with TAG re: argument memorandum and cases summary memorandum.	SS	\$470	\$3,619
4/9/2017	0.4	Review correspondence regarding joinder.	JLM	\$565	\$226

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/9/2017	10.5	Draft joinder motion argument memorandum; draft motion memorandum for same; compile reply brief exhibits; draft declaration for reply brief; use Westlaw to check citations in reply brief; apply case team's edits to reply brief; organize Dropbox folders and save documents to same; enter expenses in case management system; upload documents to case management system; review and sort emails; prepare and file joinder motion reply; serve copies of same on opposing counsel; prepare courtesy copies; draft transmittal letter for same; discuss filing, drafting, citations, memoranda, courtesy copies, and next steps with SS; review and download docket sheet from PACER.	TAG	\$310	\$3,255
4/9/2017	9	Drafted reply section for Rule 19; drafted reply section for Rule 20; cont'd working on edits and revisions to reply brief; forwarded to JB for finalization.	JLN	\$890	\$8,010
4/9/2017	6.2	Review and edit reply papers; review authority; review evidence regarding Riverside; prepare for oral argument.	JGB	\$690	\$4,278
4/10/2017	8.7	Discuss courtesy copies with TAG and review same; prepare for hearing and edits argument memorandum; draft and edit cases summary memorandum; discuss hearing with case team; meet with case team re: hearing preparation.	SS	\$470	\$4,089
4/10/2017	7.8	Email JLN re: unavailability for trial; review and edit availability calendar; email case team re: same; review and edit argument memorandum; email case plan memorandum to case team; review and annotate class certification order; email SS re: memorandum of summary of authorities; email TAG re: uploading documents to Dropbox; prepare for argument on joinder motions.	JGB	\$690	\$5,382
4/10/2017	8.1	Work on memorandum of summary of authorities and discuss same with SS.	NMG	\$310	\$2,511

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/10/2017	0.2	Discuss daily tasks and case status with KMB and TAG.	JLM	\$565	\$0
4/10/2017	3.4	Edit joinder reply briefs; meet with case team to prepare for pre-trial conference; discuss issues regarding same with JGB; draft argument memorandum for joinder and pre-trial conference.	JLM	\$565	\$1,921
4/10/2017	11.8	Prepare courtesy copies and discuss submission with KMB; correspond with Heffler re: responding to class members; discuss same with SS; prepare iPad for court appearance; draft argument memorandum; discuss next steps and preparing for argument with SS and JLM; email JLN re: trial index numbers and unavailability; revise calendar of unavailability; download documents to Dropbox; discuss argument memorandum formatting with KMB; draft and edit memorandum of summary of authorities; discuss same with SS and NMG; print and prepare documents for court appearance; review class certification order and draft summary in argument memorandum.	TAG	\$310	\$3,658
4/10/2017	1.6	Assist TAG on cases cheat sheets re: pre-trial conference.	JL	\$300	\$480
4/10/2017	1.4	Prepare courtesy copies for the Court; deliver courtesy copies to Southern District of New York.	KMB	\$310	\$434
4/11/2017	7.1	Prepare for hearing re: joinder motion and discuss same with case team; attend hearing and discuss decision and trial schedule with case team; draft and edit trial documents and discuss same with TAG; email exchange with JGB re: same.	SS	\$470	\$3,337
4/11/2017	5.3	Prepare for joinder motion argument; advocate for classes at court appearance; discuss argument and next steps with case team; lay out trial plan.	JGB	\$690	\$3,657
4/11/2017	0.1	Discuss case status and next steps with TAG.	MWS	\$585	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/11/2017	3.7	Prepare for and attend pre-argument conference; coordinate schedule for trial preparation following conference.	JLM	\$565	\$2,091
4/11/2017	6.4	Prepare for joinder motion argument; meet with case team re: same; take notes at court appearance; enter expenses in case management system; upload documents to case management system; save documents in Dropbox; create events entries for new dates and deadlines in firm calendar and case management system; discuss next steps with SS;	TAG	\$310	\$1,984
4/12/2017	8.5	Discuss next steps and drafting scripts and other trial documents with SS; discuss drafting scripts with KMB and JL; create and format direct and cross scripts for primary witnesses; upload documents to case management system; review examples of direct and cross scripts from other trial matters; review documents and draft list of potential trial evidence; discuss same with SS; draft evidence table and update witness list; email same and evidence list to JGB; review transcripts and documents and draft direct script.	TAG	\$310	\$2,635
4/12/2017	6.6	Edit direct scripts and other trial documents; research re: same; review case file and other cases re: same; discuss same with TAG; review email exchange with JGB re: same.	SS	\$470	\$3,102
4/12/2017	1.2	Draft direct scripts for class representatives; discuss same with SS and TAG.	JL	\$300	\$360
4/12/2017	0.8	Update trial plan; discuss case status with JLM.	JGB	\$690	\$552
4/12/2017	0.1	Discuss case status and next steps with TAG.	BLG	\$390	\$0
4/12/2017	0.1	Discuss trial prep with TAG.	KMB	\$310	\$31
4/13/2017	5.2	Meet with TAG and JL re: drafting direct and cross scripts and explain same; review and edit same; review deposition and other documents re: same; email exchange with case team re: trial preparation and prepare for same in general.	SS	\$470	\$2,444

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/13/2017	2.4	Continue working on direct scripts re: class member representatives.	JL	\$300	\$720
4/13/2017	0.1	Email class representative re: updated contact information.	JGB	\$690	\$69
4/13/2017	7.7	Discuss drafting scripts with SS and JL; create and format direct and cross scripts for primary witnesses; review transcripts of depositions re: same; update class representative's contact information in case management system; enter expenses in case management system.	TAG	\$310	\$2,387
4/13/2017	0.1	Discuss case status and next steps with TAG.	MWS	\$585	\$0
4/14/2017	0.6	Review direct scripts and discuss same with TAG; discuss other documents with TGA and review email to JGB re: same; review JLM's email re: next steps and plan.	SS	\$470	\$282
4/14/2017	4.1	Continue working on direct scripts re: class member representatives.	JL	\$300	\$1,230
4/14/2017	0.4	Draft and send weekly plan email; discuss trial preparation with case team.	JLM	\$565	\$226
4/14/2017	6.7	Update evidence table; draft direct scripts, cross scripts, and opening statement outline; discuss drafting scripts with JL; discuss drafting and trial prep with SS; upload documents to case management system; format and begin drafting jury instructions, verdict sheet, and voir dire questions; review examples of documents from previous trials.	TAG	\$310	\$2,077
4/15/2017	1.2	Review drafts of trial documents; email case team thoughts.	JGB	\$690	\$828
4/16/2017	0.3	Discuss case strategy with partner	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/17/2017	4.8	Review and edit voir dire and proposed jury charges; research re: same; review Judge's recent decision re: same and discuss same with TAG; email exchange with JGB re: trial documents.	SS	\$470	\$2,256
4/17/2017	0.6	Review JGB comments to weekly plan email; review draft trial documents.	JLM	\$565	\$339
4/17/2017	0.2	Discuss daily tasks and case status with KMB and TAG.	JLM	\$565	\$0
4/17/2017	6.2	Discuss next steps with SS; draft proposed voir dire questions; draft proposed jury instructions; draft verdict sheet; conduct Westlaw research re: same; review docket and court-filed documents from previous trials before Judge Stein; discuss same with SS.	TAG	\$310	\$1,922
4/17/2017	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$310	\$62
4/18/2017	3.7	Continue trial preparation and review of discovery re: evidence table and witnesses; discuss with TAG re: updated jury charges and voir dire; review email exchange with JGB re: same.	SS	\$470	\$1,739
4/18/2017	0.1	Email JLM re: next steps.	JGB	\$690	\$69
4/18/2017	0.4	Review trial plan and transcripts; discuss next steps with case team.	JLM	\$565	\$226
4/18/2017	0.1	Discuss trial prep and next steps with TAG.	MWS	\$585	\$0
4/18/2017	4.6	Draft proposed voir dire questions; draft proposed jury instructions; review court-filed documents from previous trials before Judge Stein; discuss same with SS; discuss drafting direct and cross scripts with JL.	TAG	\$310	\$1,426
4/18/2017	3.2	Continue drafting direct scripts; review deposition transcripts re: same.	JL	\$300	\$960

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/19/2017	3.8	Discuss with TAG re: trial preparation, direct scripts and other documents; review and edit same; review court file and discovery documents re: same.	SS	\$470	\$1,786
4/19/2017	6.9	Continue drafting direct scripts; review deposition transcripts.	JL	\$300	\$2,070
4/19/2017	4.7	Draft proposed jury instructions; draft transition memorandum; review documents re: same; review depositions and draft direct scripts.	TAG	\$310	\$1,457
4/19/2017	0.1	Discuss case status and next steps with TAG.	BLG	\$390	\$0
4/20/2017	0.6	Review trial documents and assure direct and jury instructions are set aside.	SS	\$470	\$282
4/20/2017	6.2	Discuss case status and next steps with BLG; continue drafting and editing direct scripts; review deposition transcripts of class representatives.	JL	\$300	\$1,860
4/20/2017	4.1	Draft transition memorandum; review documents re: same; draft monthly update; create contact entries in case management system; enter expense in case management system.	TAG	\$310	\$1,271
4/20/2017	0.1	Discuss case status and next steps with TAG.	BLG	\$390	\$0
4/20/2017	0.1	Discuss case status and next steps with JL.	BLG	\$390	\$0
4/21/2017	0.7	Email JLN re: filing new complaint and plan for trial; review proposed plan.	JGB	\$690	\$483
4/21/2017	0.1	Discuss case status and next steps with JL,	MWS	\$585	\$0
4/21/2017	1.1	Draft and send weekly plan email; determine trial schedule; discuss same with case team; review trial documents.	JLM	\$565	\$622
4/21/2017	0.2	Review documents for shredding; discuss next steps with MWS.	TAG	\$310	\$62

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/21/2017	5.8	Discuss case status and next steps with MWS; continue drafting direct scripts for class representatives.	JL	\$300	\$1,740
4/23/2017	0.3	Discuss case strategies with partner.	JGB	\$690	\$207
4/24/2017	0.2	Discuss prospective call with Jack Hall with JLM re: bankruptcy issues.	MWS	\$585	\$117
4/24/2017	0.2	Review and provide thoughts on case plan memorandum; email JLM re: discussing matter with bankruptcy counsel.	JGB	\$690	\$138
4/24/2017	0.1	Review case plan memorandum.	KMB	\$310	\$31
4/24/2017	0.6	Review JGB comments to weekly plan email; arrange call with bankruptcy counsel; review trial documents and discuss plan with JGB.	JLM	\$565	\$339
4/24/2017	1.7	Review notes and compare to case management system to ensure proper saving; review documents and files on discs; scan and upload documents to case management system; download files from disc and save in Dropbox; enter expenses in case management system; review and sort emails.	TAG	\$310	\$527
4/24/2017	5.2	Continue working on direct scripts for class representatives.	JL	\$300	\$1,560
4/25/2017	0.1	Discuss prospective call with Jack Hall with JLM re: bankruptcy issues.	MWS	\$585	\$59
4/25/2017	0.7	Email case team re: advice of bankruptcy counsel; email JLN re: drafting new claims.	JGB	\$690	\$483
4/25/2017	0.4	Coordinate trial calendar with case team; email co-counsel re: same; update calendar name.	KMB	\$310	\$124
4/25/2017	1.6	Call with bankruptcy counsel regarding Riverside issues; discuss filing of new complaint with case team; discuss damages proposal with case team.	JLM	\$565	\$904

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/25/2017	0.2	Discuss daily tasks and case status with KMB and TAG.	JLM	\$565	\$113
4/25/2017	2.7	Discuss next steps with JLM; take notes on call with bankruptcy counsel; review documents and draft damages proposal; discuss same with JLM.	TAG	\$310	\$837
4/26/2017	6.8	Enter phone note for call with bankruptcy counsel; update transition memorandum; discuss transition with KMB; review documents and draft damages proposal; discuss same with JLM; apply MWS's edits to damages proposal; conduct Westlaw research re: classes in bankruptcy; draft memorandum re: same; discuss same with JLM and BLG.	TAG	\$310	\$2,108
4/26/2017	0.2	Discuss damages letter with JLM and TAG; review and revise same.	MWS	\$585	\$117
4/26/2017	1.1	Draft and edit damages proposal.	JLM	\$565	\$622
4/26/2017	0.1	Discuss case status and next steps with JL.	BLG	\$390	\$0
4/26/2017	0.1	Discuss case status and next steps with TAG.	BLG	\$390	\$0
4/26/2017	0.8	Discuss next steps and comprehensive case plan with JLM.	JGB	\$690	\$552
4/26/2017	0.7	Discuss case status and next steps with TAG.	KMB	\$310	\$217
4/27/2017	1.3	Email JLM re: next steps and adjourning trial; email opposing counsel re: adjourning trial; email JLM re: next steps; review case summary memorandum re: trial prep.	JGB	\$690	\$897
4/27/2017	0.1	Discuss daily tasks and case status with KMB and TAG.	JLM	\$565	\$0
4/27/2017	2.4	Research damages issues; discuss same with case team; draft damages proposal.	JLM	\$565	\$1,356

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/27/2017	3.8	Conduct Westlaw research re: classes in bankruptcy; draft memorandum re: same; discuss next steps with JLM; discuss damages proposal with JLM; upload document to case management system; review files and prepare list of potential clients; discuss same with JLM.	TAG	\$310	\$1,178
4/28/2017	1.7	Review and edit letter to court re: damages; email case team re: same; review and provide thoughts on case plan memorandum; discuss trial schedule in details with JLM.	JGB	\$690	\$1,173
4/28/2017	0.3	Line edit letter re: damages.	NMG	\$310	\$93
4/28/2017	0.2	Review and revise damages letter; discuss same with TAG.	MWS	\$585	\$117
4/28/2017	1.4	Draft and edit letter regarding damages proposal; correspond with opposing counsel regarding same; discuss same with case team.	JLM	\$565	\$791
4/28/2017	3.2	Monthly review of documents, filings, contacts, and other summary and general case information; update case summary memorandum; review and upload documents to case management system; save documents in Dropbox; enter phone notes for correspondence with class members; revise damages proposal letter; discuss line edits with MWS; prepare and file damages proposal letter; discuss same with JLM; conduct research re: classes as bankruptcy creditors; draft memorandum re: same; review, scan, and upload notes to case management system.	TAG	\$310	\$992
4/29/2017	1.4	Edit and file damages statement.	JLM	\$565	\$791
4/29/2017	1	Conduct research and draft memorandum re: classes as creditors in bankruptcy.	TAG	\$310	\$310
5/1/2017	0.3	Discuss case status and weekly tasks with KMB and JL; review correspondence regarding trial schedule; review JGB comments to weekly plan email.	JLM	\$565	\$113

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/1/2017	0.8	Email exchange with opposing counsel re: trial schedule; review trial plan.	JGB	\$690	\$552
5/1/2017	0.8	Review case plan memorandum; discuss case status and next steps with JLM; draft monthly updates.	KMB	\$310	\$248
5/2/2017	0.2	Review correspondence regarding trial schedule.	JLM	\$565	\$113
5/2/2017	0.1	Discuss case status and next steps with KMB.	MWS	\$585	\$0
5/2/2017	1.3	Discuss case status and next steps with MWS; review third amended complaint; review email exchanges with opposing counsel re: trial date.	KMB	\$310	\$403
5/3/2017	0.2	Review letter regarding brief adjournment of trial; discuss same with case team.	JLM	\$565	\$113
5/3/2017	0.3	Email exchange with clerk re: trial adjournment; review letter to Court re: adjournment.	JGB	\$690	\$207
5/3/2017	1.1	Discuss case status and next steps with BLG; review email exchange with case team and clerk re: trial adjournment; draft letter to Court re: adjournment; edit and finalize letter to the Court; file letter; email court filed document to opposing counsel.	KMB	\$310	\$341
5/3/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
5/3/2017	0.1	Discuss case status and next steps with JL.	BLG	\$390	\$0
5/4/2017	0.1	Review Court order re: trial adjournment.	JGB	\$690	\$69
5/4/2017	0.2	Discuss daily tasks and case status with KMB and JL; review scheduling order from Court.	JLM	\$565	\$113
5/4/2017	0.1	Discuss case status and next steps with JLM.	KMB	\$310	\$31

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/5/2017	3.3	Draft and send weekly plan email; review transcripts of depositions and coordinate schedule for in-depth review; review endorsed letter from Court regarding trial schedule and related correspondence with opposing counsel; correspond with opposing counsel regarding deposition transcript.	JLM	\$565	\$1,865
5/5/2017	1.6	Discuss case status and next steps with JLN.	JGB	\$690	\$1,104
5/5/2017	0.4	Complete weekly review, update, and organization of case files; discuss case status and next steps with JLM; search for deposition transcripts.	KMB	\$310	\$124
5/7/2017	0.3	Review case plan and update case summary memorandum	JGB	\$690	\$207
5/8/2017	0.4	Discuss case status and weekly tasks with KMB; review correspondence regarding transcript issues and discuss same with KMB; review JGB comments to weekly plan email.	JLM	\$565	\$170
5/8/2017	1.3	Review case plan memorandum; discuss case status and next steps with JLM; save deposition scripts in Dropbox; call court reporter re: transcript; complete transcript request form; email from to court reporter; email exchange with court reporter; email case team re: teleconference recordings for Judge Fox.	KMB	\$310	\$403
5/8/2017	0.5	Review and provide thoughts on case plan memorandum; discuss trial plan with JLM.	JGB	\$690	\$345
5/9/2017	0.1	Discuss case status and next steps with KMB.	MWS	\$585	\$0
5/10/2017	0.4	Review monthly update to class; discuss same with KMB; correspond with case team regarding fraudulent concealment claim and plaintiff for Riverside complaint.	JLM	\$565	\$226
5/10/2017	0.8	Discuss case status and next steps with BLG; draft and email class member monthly update	KMB	\$310	\$248

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/10/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
5/11/2017	0.7	Email exchange with case team re: responding to class members and Riverside complaint.	JGB	\$690	\$483
5/11/2017	2.8	Discuss case status and next steps with JLM; review third amended complaint and class certification documents; review email exchange with case team re: updating class members.	KMB	\$310	\$868
5/11/2017	1.1	Discuss daily tasks and case status with KMB; review correspondence from class members; draft language responding to same and discuss with case team; discuss class representative issues for Riverside complaint with case team.	JLM	\$565	\$565
5/12/2017	2.1	Correspond with class members regarding trial; review deposition transcript; select class representatives for Riverside matter; draft complaint for Riverside action.	JLM	\$565	\$1,187
5/12/2017	0.1	Discuss case status and next steps with KMB.	MWS	\$585	\$0
5/12/2017	0.8	Email exchange with case team re: updating clients and next steps; review trial plan.	JGB	\$690	\$552
5/12/2017	0.2	Complete weekly review, update, and organization of case files; discuss case status and next steps with MWS.	KMB	\$310	\$62
5/15/2017	2.1	Discuss weekly tasks and case status with KMB; review deposition transcripts for trial preparation.	JLM	\$565	\$1,130
5/15/2017	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$310	\$62
5/16/2017	2.4	Review transcripts and trial documents.	JLM	\$565	\$1,356
5/16/2017	0.1	Discuss case status and next steps with MWS.	KMB	\$310	\$31
5/16/2017	0.1	Discuss case status and next steps with KMB.	MWS	\$585	\$0
5/17/2017	1	Review deposition transcripts.	JLM	\$565	\$565

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/17/2017	0.1	Discuss case status and next steps with KMB.	MWS	\$585	\$0
5/17/2017	0.1	Discuss case status and next steps with MWS.	KMB	\$310	\$31
5/18/2017	2.4	Discuss daily tasks and case status with KMB; edit pre-trial documents; edit subpoenas for IJL witnesses; discuss same with case team; review transcripts in preparation for trial.	JLM	\$565	\$1,300
5/18/2017	1.2	Discuss case status and next steps with JLM; email trial documents to JLM; draft trial subpoenas	KMB	\$310	\$372
5/19/2017	1.7	Draft and send weekly plan email; edit and circulate draft pre-trial submissions; circulate draft subpoenas.	JLM	\$565	\$961
5/19/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31
5/21/2017	0.1	Review and give thoughts on case summary memorandum.	JGB	\$690	\$69
5/22/2017	1.1	Discuss case status and weekly tasks with JL and KMB; review trial preparation documents; review deposition transcripts.	JLM	\$565	\$565
5/22/2017	3.8	Review case plan memorandum; discuss case status and next steps with JLM; review Rule 56.1 statements; draft JPTO.	KMB	\$310	\$1,178
5/23/2017	0.4	Review trial subpoenas; email case team re: next steps.	JGB	\$690	\$276
5/23/2017	1.2	Discuss case status and next steps with MWS; review Rule 56.1 statements for stipulated facts; edit JPTO.	KMB	\$310	\$372
5/23/2017	2.3	Edit draft JPTO; review and edit trial documents; discuss some with case team; review deposition transcripts.	JLM	\$565	\$1,300
5/23/2017	0.1	Discuss case status and next steps with KMB.	MWS	\$585	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/24/2017	1.2	Review trial documents; meet with JLM re: trial preparations.	JGB	\$690	\$828
5/24/2017	0.2	Email JGB all trial documents.	KMB	\$310	\$62
5/24/2017	1.4	Meet with JGB to discuss trial preparation; review trial documents; edit subpoenas; correspond with co-counsel regarding the same; review deposition transcripts.	JLM	\$565	\$791
5/24/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
5/25/2017	0.2	Discuss case status and daily tasks with KMB and JL; draft and send email to Shapiro regarding trial subpoenas.	JLM	\$565	\$57
5/25/2017	0.9	Draft trial subpoenas; email final trial subpoenas to JLM.	KMB	\$310	\$279
5/26/2017	0.1	Draft and send weekly plan email.	JLM	\$565	\$57
5/26/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31
5/30/2017	0.4	Discuss case status and next steps with JLM.	JGB	\$690	\$276
5/30/2017	1.1	Edit complaint and send same to potential class representative; discuss same with JLN.	JLM	\$565	\$622
5/30/2017	0.2	Discuss case status and weekly tasks with KMB and DD; review correspondence of opposing counsel regarding trial subpoenas.	JLM	\$565	\$57
5/30/2017	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$310	\$62
5/31/2017	0.8	Monthly review of documents, filings, contacts, and other summary and general case information; phone call with class member; discuss case status and next steps with BLG.	KMB	\$310	\$248
5/31/2017	1.7	Discuss trial preparations and next steps with JLM.	JGB	\$690	\$1,173

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/31/2017	2.1	Discuss case with JLM; draft joint pretrial order.	DD	\$325	\$683
5/31/2017	2.4	Edit pre-trial documents; meet with JGB to discuss same; discuss preparation of same with case team.	JLM	\$565	\$1,356
5/31/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
6/1/2017	4.3	Discuss joint pre-trial order with JLM; draft same.	DD	\$325	\$1,398
6/1/2017	0.1	Discuss case status and daily tasks with DD.	JLM	\$565	\$0
6/1/2017	0.1	Discuss case status and daily tasks with KMB and DD.	JLM	\$565	\$0
6/1/2017	1.6	Discuss case status and next steps with JLM; edit JPTO; discuss JPTO with DD.	KMB	\$310	\$496
6/2/2017	3.2	Review complaint and other documents to draft joint pretrial order.	DD	\$325	\$1,040
6/2/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
6/2/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31
6/5/2017	0.1	Discuss matter and case updates with JLM.	DD	\$325	\$33
6/5/2017	0.5	Review case plan memorandum; discuss case status and next steps with MWS; phone call with a potential class member.	KMB	\$310	\$155
6/5/2017	0.2	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$138
6/6/2017	2.6	Review exhibits; draft joint pre-trial order; research jury charge issues.	JLM	\$565	\$1,469
6/6/2017	0.3	Email exchange with case team re: meeting; email opposing counsel re: witnesses; discuss trial prep with JLM.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/6/2017	0.3	Discuss next steps and trial prep with MWS; phone call with JLN re: case meeting; discuss direct scripts with JLM.	KMB	\$310	\$93
6/7/2017	1.8	Review exhibits; draft joint pre-trial order; research jury charge issues.	JLM	\$565	\$1,017
6/7/2017	1.7	Meet with case team re: trial prep; email opposing counsel re: witnesses and evidence; review trial documents.	JGB	\$690	\$1,173
6/7/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
6/7/2017	2.1	Discuss trial prep with BLG; update Dropbox with trial documents; meet with case team re: trial prep.	KMB	\$310	\$651
6/8/2017	0.2	Discuss Defendants' court filed letter re: witnesses with JLM.	JGB	\$690	\$138
6/8/2017	9.1	Edit proposed jury instructions; discuss direct examination, cross examination, and trial-prep with JLM; draft memo regarding potential trial issues; review depositions to draft cross examination of Irene LaCorta.	DD	\$325	\$2,958
6/8/2017	0.8	Discuss trial prep and next steps with JLM; review Defendants letter filed with the Court re: trial witnesses; save, sort, and code documents into case management system; call chambers re: email issues and filing opposition; discuss drafting direct scripts with DD.	KMB	\$310	\$248
6/8/2017	3.1	Discuss case status and daily tasks with KMB, JL, and DD; review exhibits; draft joint pre-trial order; research jury charge issues.	JLM	\$565	\$1,695
6/9/2017	8.3	Review Irene LaCota's deposition transcript to draft cross examination; line edit letter to Judge Stein regarding defendants' request to contact class members.	DD	\$325	\$2,698

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/9/2017	1	Research issues for letter to court regarding witnesses; discuss same with case team; edit and file same.	JLM	\$565	\$565
6/9/2017	0.9	Complete weekly review, update, and organization of case files; share Dropbox folder with JLN and his staff; edit letter in opposition to Defendants' letter; file letter with the Court; save, sort, and code documents into case management system.	KMB	\$310	\$279
6/9/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
6/11/2017	2.8	Review and give thoughts on case summary memorandum; review and edit proposed JPTO, request to charge, verdict sheet, exhibit list, and evidence table.	JGB	\$690	\$1,932
6/12/2017	2.1	Discuss case status and daily tasks with KMB and DD; review deposition transcripts and prepare trial documents.	JLM	\$565	\$1,130
6/12/2017	7.7	Review LaCota's deposition transcript and amended complaint; discuss next steps with JLM; draft cross examination script.	DD	\$325	\$2,503
6/12/2017	0.9	Review case plan memorandum; discuss trial preparations and next steps with JLM; draft extension letter to file pre-trial documents.	KMB	\$310	\$279
6/13/2017	2.4	Review deposition transcripts; draf and edit direct scripts for trial.	JLM	\$565	\$1,356
6/13/2017	8.9	Draft cross script of LaCota; review deposition transcripts; discuss next steps regarding joint pre trial order and proposed jury instructions with JLM.	DD	\$325	\$2,893
6/13/2017	0.1	Discuss trial preparations and next steps wtih KMB.	MWS	\$585	\$0
6/13/2017	0.7	Discuss trial preparations and next steps with MWS; attend meeting with JLM and JLN re: pre-trial documents.	KMB	\$310	\$217

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/13/2017	0.2	Email exchange with JLM re: next steps.	JGB	\$690	\$138
6/14/2017	0.1	Discuss trial preparations with BLG.	KMB	\$310	\$31
6/14/2017	2.1	Draft cross examination script of LaCota.	DD	\$325	\$683
6/14/2017	2.4	Review and edit evidence table; meet with JLM re: trial preparations.	JGB	\$690	\$1,656
6/14/2017	0.1	Discuss trial preparations and next steps with KMB.	BLG	\$390	\$0
6/14/2017	0.1	Discuss next steps and review preliminary cross examination of LaCota with DD.	BLG	\$390	\$0
6/14/2017	0.1	Discuss next steps and review cross examination of LaCota with BLG.	DD	\$325	\$33
6/15/2017	0.2	Discuss case status and daily tasks with DD and KMB.	JLM	\$565	\$57
6/15/2017	4.3	Draft cross examination of LaCota.	DD	\$325	\$1,398
6/15/2017	0.1	Discuss next steps and cross examination of LaCota with JLM.	DD	\$325	\$33
6/15/2017	0.3	Email exchanges and discussion with case team re next steps.	JGB	\$690	\$207
6/16/2017	3.9	Draft and send weekly plan email; review depositions and exhibits; draft pre-trial documents and discuss motions in limine issues with case team.	JLM	\$565	\$2,204
6/16/2017	1.4	Review most up to date evidence table; email exchanges with outside colleague re: trial issues; discuss trial issues with JLM.	JGB	\$690	\$966
6/16/2017	7.2	Draft cross examination of LaCota; review deposition transcript and exhibits.	DD	\$325	\$2,340

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/16/2017	1.1	Complete weekly review, update, and organization of case files; discuss trial preparations with MWS; finalize subpoenas; call Serving by Irving re: locating witnesses for trial; email last known addresses for witnesses to Serving by Irving; email case team Angel Valasquez's call phone from deposition transcript.	KMB	\$310	\$341
6/19/2017	3.3	Discuss case status and weekly tasks with KMB, DD NLG, and JL; draft joint pre trial order; review deposition testimony; correspond with case team regarding trial plan.	JLM	\$565	\$1,808
6/19/2017	1.7	Discuss trial prep with JLM and JLN; review exhibits.	JGB	\$690	\$1,173
6/19/2017	8.7	Discuss next steps regarding deposition designations with JLM; draft cross examination of LaCota; review supplemental declaration; research deposition designation uses in SDNY.	DD	\$325	\$2,828
6/19/2017	0.6	Review case plan memorandum; discuss trial preparations with JLM; follow up with case team re: new mailing addresses for possible witnesses; email JLN updated phone number for Velasquez.	KMB	\$310	\$186
6/20/2017	7.9	Draft and edit joint pre trial order; call with co-counsel to discuss witnesses and joint pre trial order; discuss exhibit and witness issues with case team; discuss motions in limine with BLG; draft and research same; draft and edit evidence table; edit verdict sheet and jury charge.	JLM	\$565	\$4,464
6/20/2017	2.8	Email case team re: trial preparations and next steps; review JPTO; discuss JPTO and range of trial and evidence issues with JLM.	JGB	\$690	\$1,932
6/20/2017	1.3	Draft motions in limine for class cert decision and damages since last calculation.	BLG	\$390	\$507
6/20/2017	6	Research deposition designations of non-parties and unavailable witnesses; draft memo to JLM regarding same.	DD	\$325	\$1,950

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/20/2017	3.3	Discuss trial preparations with MWS; review deposition transcript and insert deposition designations into JPTO; discuss trial subpoenas and JPTO with JLM.	KMB	\$310	\$1,023
6/21/2017	5.9	Draft pre-trial document; prepare exhibit list; review depositions transcripts in preparation for trial.	JLM	\$565	\$3,334
6/21/2017	3.1	Discuss trial preparation and joint pretrial order with case team; discuss MIL and related trial and JPTO issues with JLM.	JGB	\$690	\$2,139
6/21/2017	1	Update subpoenas to correct dates; draft letter to a witness.	NLG	\$300	\$300
6/21/2017	1.7	Research subpoenaing witness outside of 100 miles from courthouse; draft motion in limine regarding damages from 2014 to present.	BLG	\$390	\$663
6/21/2017	3.6	Draft memo regarding deposition designations in court to JLM.	DD	\$325	\$1,170
6/21/2017	0.3	Draft electronic order and save same in case management system; email KMB re: the same.	NMG	\$310	\$93
6/21/2017	1.1	Discuss matter and ongoing damages discovery in class actions with BLG; research ongoing discovery.	DAF	\$325	\$358
6/21/2017	0.1	Discuss research on deposition designations with BLG.	DD	\$325	\$33
6/21/2017	0.1	Discuss case status and next steps with DAF.	BLG	\$390	\$0
6/21/2017	0.1	Discuss case status and next steps DD.	BLG	\$390	\$0
6/21/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/21/2017	7.7	Discuss trial preparations with BLG; review depositions; insert deposition designations into joint pretrial order; update exhibit list into joint pretrial order; search for documents re: damages; search for additional exhibits for joint pretrial order; review telephone scripts; compare updated exhibit list with new exhibit list; email JLM re: new exhibits.	KMB	\$310	\$2,387
6/22/2017	11.1	Complete weekly review, update, and organization of case files; discuss joint pretrial order and next steps with JLM; review deposition transcript and enter deposition designations in joint pretrial order; enter all Defendants' exhibits, witnesses, and objections into joint pretrial order; search for citations for motion in limine; email exchange with opposing counsel re: exhibits; search for all Defendants exhibits; save exhibits into Dropbox.	KMB	\$310	\$3,441
6/22/2017	4.6	Discuss joint pre-trial order and motion in limine with case team; email; exchange with opposing counsel re: joint pre-trial order; edit motion in limine.	JGB	\$690	\$3,174
6/22/2017	0.4	Discuss research for motion in limine for excluding witnesses with DD.	BLG	\$390	\$156
6/22/2017	1.2	Review witness deposition transcripts re: designation; discuss same with KMB and JLM.	JL	\$300	\$360
6/22/2017	3.2	Find and review IJL disclosures against witness list in Joint Pretrial Order; locate and save exhibits in Dropbox.	NMG	\$310	\$992
6/22/2017	5.7	Discuss next steps with JLM; research and draft memorandum regarding Federal Rule of Evidence 403 issue excluding newly added witnesses.	DD	\$325	\$1,853
6/22/2017	16.1	Draft and edit motions in limine; draft and edit joint pre-trial order; correspond with opposing counsel regarding same; review newly filed exhibits; review and edit pre-trial documents; discuss same with JGB.	JLM	\$565	\$9,097

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/23/2017	6.3	Edit memorandum of law in support of motions in limine and supporting papers; edit pre-trial documents; email exchange with case team re: the same.	JGB	\$690	\$4,347
6/23/2017	4.2	Review and edit motions in limine; discuss same with NMG; edit declaration of JLN; file with court re: verdict sheet, voir dire, and jury instructions; discuss same with BLG.	JL	\$300	\$1,260
6/23/2017	5.2	Edit notice of motion and declaration of JLN; input objections to JPTO for new exhibits; finalize all filings and file with the court.	BLG	\$390	\$2,028
6/23/2017	1.1	Review and revise pre-trial documents; discuss same with case team.	MWS	\$585	\$644
6/23/2017	0.4	Review defendants' motion in limine.	JLN	\$890	\$356
6/23/2017	9.4	Discuss case and next steps with BLG; line edit and incorporate JGB and RJL edits into motions in limine; draft JLN declaration and notice of motions; insert JGB edits into voir dire, verdict sheet and jury instructions; finalize all aspects of documents before filing; file motions in limine and supporting documents.	NMG	\$310	\$2,914
6/23/2017	1.7	Check citations and line edit memorandum of law and motions in limine.	RJL	\$325	\$553
6/23/2017	7.1	Edit exhibit list objections and deposition designations and cross-designations for proposed joint pre-trial order; discuss same with case team; edit motions in limine and discuss same with case team.	JLM	\$565	\$4,012
6/25/2017	1.6	Review deposition transcripts; prepare for pre-trial conference.	JLM	\$565	\$904
6/26/2017	0.8	Print and organize documents as requested by KMB	NLG	\$300	\$240

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/26/2017	7.5	Draft argument memorandum in preparation for conference; review documents and letters submitted by opposing counsel; research issues in preparation of conference; review motions in limine and prepare for opposition to same; discuss weekly tasks and case status with KMB.	JLM	\$565	\$4,181
6/26/2017	0.1	Discuss next steps and upcoming conference with JLM.	DD	\$325	\$33
6/26/2017	3.6	Discuss issues with motions in limine and other trial preparations with case team; review and edit case summary memorandum; prepare for argument on damages and pretrial issues.	JGB	\$690	\$2,484
6/26/2017	4.4	Review case plan memorandum; discuss case status and next steps with JLM; call clerk re: filing issue; refile motions in limine; save, sort, and code documents into case management system; edit case summary memorandum; update Dropbox in preparation for court hearing; save, sort, and code documents into case management system.	KMB	\$310	\$1,364
6/26/2017	0.6	Reviewed plaintiffs' motions in limine.	JLN	\$890	\$534
6/27/2017	4.2	Discuss preparation for court conference; meet with JLM to discuss court conference strategy; advocate for client at court conference; email case team re: next steps.	JGB	\$690	\$2,898
6/27/2017	1.4	Research standing issue being raised for the first time on a motion in limine.	BLG	\$390	\$546
6/27/2017	0.9	Review, print, and organize documents requested by KMB.	NLG	\$300	\$270
6/27/2017	6.9	Prepare for and attend pre-trial conference; meet with JGB and JLN in preparation for same; review JGB plan for next steps; research and draft letter regarding damages.	JLM	\$565	\$3,899

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/27/2017	4.4	Attend court proceeding regarding damages calculation; research damage calculation for fraudulent inducement.	DD	\$325	\$1,430
6/27/2017	6.1	Discuss status conference and next steps with BLG; prepare hard copies for status conference; review argument memorandum; update Dropbox; update Firm iPads; attend court conference; discuss court conference and next steps with case team; scan, save, sort, and code phone notes into case management system; update firm calendars with new court dates.	KMB	\$310	\$1,891
6/27/2017	1.7	Travel to SDNY for conf. i/f/o Judge Stein; conf. i/f/o Judge Stein; travel back to office	JLN	\$890	\$1,513
6/27/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
6/27/2017	0.1	Discuss case status and next steps with NLG.	BLG	\$390	\$0
6/27/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
6/28/2017	1.6	Research damages issues; discuss draft letter with DD.	JLM	\$565	\$904
6/28/2017	4.5	Research damages calculation re fraudulent inducement cases; discuss same with JLM.	DD	\$325	\$1,463
6/28/2017	1.1	Draft update email to client; phone call with potential class member; save, sort, and code phone note into case management system; save, sort, and code document into case management system.	KMB	\$310	\$341
6/28/2017	0.2	Reviewed letter to Court from JB re: damages methodology.	JLN	\$890	\$178
6/28/2017	0.1	Received Court Order re: letter to Court re: damages calculations.	JLN	\$890	\$89
6/28/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
6/28/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/29/2017	3.4	Discuss case status and next steps with KMB and DD; research and draft letter regarding damages.	JLM	\$565	\$1,865
6/29/2017	4	Review defendants' letter to judge re damage calculations and class certification order; draft letter to judge re damage calculation.	DD	\$325	\$1,300
6/29/2017	0.2	Discuss next steps, case law, and letter to Judge Stein with JLM.	DD	\$325	\$65
6/29/2017	0.3	Discuss letter to court re: damages and next steps with JLM; discuss Dropbox organization with JGB.	KMB	\$310	\$93
6/30/2017	5.7	Draft and edit letter to Court regarding damages.	JLM	\$565	\$3,221
6/30/2017	0.7	Review and edit damages letter.	JGB	\$690	\$483
6/30/2017	0.4	Discus damages letter and next steps with KMB; review and revise damages letter.	MWS	\$585	\$176
6/30/2017	1.1	Monthly review of documents, filings, contacts, and other summary and general case information; discuss damages letter and next steps with MWS; search for citations for damages letter; finalize and file damages letter with the Court; save, sort, and code documents into case management system.	KMB	\$310	\$341
7/2/2017	0.1	Draft and send weekly plan email.	JLM	\$565	\$57
7/3/2017	0.5	Review defendants' April 28th letter to the court.	DD	\$325	\$163
7/3/2017	0.1	Discuss case updates and next steps with JLM.	DD	\$325	\$33
7/3/2017	0.3	Discuss case status and weekly tasks with DD, KMB, and JL; correspond with opposing counsel regarding trial subpoenas and next steps with Heffler.	JLM	\$565	\$113
7/3/2017	0.6	Review case plan memorandum; discuss updating class representatives and next steps with JLM; draft monthly update to class members and class representatives.	KMB	\$310	\$186

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/3/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/5/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
7/5/2017	6.4	Draft memorandum to JLM distinguishing cases in defendants' damages letter.	DD	\$325	\$2,080
7/5/2017	0.1	Discuss case status and next steps with JL.	BLG	\$390	\$0
7/6/2017	2.6	Draft memorandum distinguishing cases in defendants' damages letter to JLM.	DD	\$325	\$845
7/6/2017	0.1	Discuss memorandum distinguishing cases in defendants' damages letter with JLM.	DD	\$325	\$33
7/6/2017	0.1	Discuss case status and daily tasks with DD.	JLM	\$565	\$57
7/10/2017	0.1	Discuss case updates and next steps with JLM.	DD	\$325	\$33
7/10/2017	0.1	Discuss discovery and next steps with JLM.	JL	\$300	\$30
7/10/2017	0.1	Review case plan memorandum.	KMB	\$310	\$31
7/10/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/13/2017	2.1	Review research memorandum regarding decertification issue; research issues in preparation for motion to decertify; review correspondence regarding scheduling; confirm new schedule.	JLM	\$565	\$1,187
7/13/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
7/14/2017	0.3	Confirm scheduling issues and discuss motion to decertify issues with case team.	JLM	\$565	\$170
7/14/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31
7/16/2017	0.1	Draft and send weekly plan email.	JLM	\$565	\$57

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/17/2017	6.3	Draft memorandum distinguishing cases in defendants' damages letter.	DD	\$325	\$2,048
7/17/2017	0.7	Review case plan memorandum; discuss next steps and decertification motion with JLM; save, sort, and code documents into case management system	KMB	\$310	\$217
7/17/2017	0.7	Review motion to decertify filings; discuss next steps with case team; review JGB comments to weekly plan email; discuss case status and next steps with KMB and DD.	JLM	\$565	\$339
7/17/2017	0.1	Discuss case updates and next steps with JLM.	DD	\$325	\$33
7/17/2017	3.2	Reviewed Defendants' motions to decertify the class; notes re: same.	JLN	\$890	\$2,848
7/17/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/18/2017	0.1	Email exchange with case team re: updating classing members.	JGB	\$690	\$69
7/18/2017	3.3	Draft and edit update language to the classes and to class representatives; review motion to decertify papers.	JLM	\$565	\$1,865
7/18/2017	1.8	Discuss monthly updates with JLM; draft and email class representatives monthly update; draft and send out monthly update to all class members; troubleshoot mail chip.	KMB	\$310	\$558
7/18/2017	3.4	Legal research re: defendants' motion to decertify.	JLN	\$890	\$3,026
7/19/2017	1.6	Research issues and distinguish cases for opposiiton to motion to decertify.	JLM	\$565	\$904
7/19/2017	6.4	Draft motion memo regarding defendants' decertification motion.	DD	\$325	\$2,080
7/19/2017	0.1	Discuss case updates and motion memo regarding decertification motion with BLG.	DD	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/19/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
7/20/2017	2.2	Discuss daily tasks and case status with KMB and DD; correspond with co-counsel about plan for drafting opposition to motion to decertify; discuss same with case team; research issues and distinguish cases for opposition to motion to decertify.	JLM	\$565	\$1,187
7/20/2017	7.8	Research case law in defendants' memorandum of law in support of decertification motion; distinguish cases in same; draft memorandum regarding same.	DD	\$325	\$2,535
7/20/2017	3.4	Cont'd research on defendants' motion to decertify.	JLN	\$890	\$3,026
7/20/2017	0.3	Discuss case updates, defendants' decertification motion, and decertification research.	DD	\$325	\$98
7/21/2017	2.7	Draft and send weekly plan email; review motion to decertify cases; discuss next steps with case team; research cases and edit motion memorandum.	JLM	\$565	\$1,526
7/21/2017	3.2	Cont'd research on defendants' motion to decertify.	JLN	\$890	\$2,848
7/21/2017	0.1	Discuss case updates and next steps with BLG.	DD	\$325	\$33
7/21/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0
7/21/2017	0.1	Discuss case status and next steps with KMB.	BLG	\$390	\$0
7/21/2017	0.7	Complete weekly review, update, and organization of case files; review email exchanges with case team re: opposition to motion for decertification; phone call with a potential class member.	KMB	\$310	\$217
7/21/2017	7.6	Draft memorandum distinguishing cases in defendants' decertification memorandum.	DD	\$325	\$2,470

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/23/2017	2.7	Started drafting point I of opposition (no intervening change).	JLN	\$890	\$2,403
7/24/2017	0.8	Discuss weekly tasks and case status with KMB and DD; review JGB comments to weekly plan email; review motion to decertify issues and discuss same with case team.	JLM	\$565	\$396
7/24/2017	2.3	Draft and edit Rule 11 motion letter to opposing counsel regarding brief for decertification.	BLG	\$390	\$897
7/24/2017	0.2	Review case plan memorandum; discuss opposition to motion for decertification with JLM.	KMB	\$310	\$62
7/24/2017	0.1	Discuss case updates and next steps with JLM.	DD	\$325	\$33
7/24/2017	8	Drafted point II of opposition (damages can be calculated on classwide basis); cont'd working on point II of opposition to decertification motion	JLN	\$890	\$7,120
7/24/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/25/2017	4.8	Cont'd working on point II to oppose decertification motion.	JLN	\$890	\$4,272
7/26/2017	3.2	Reserch issues regarding motion to dismiss arguments in motion to decertify; discuss strategy regarding same with case team.	JLM	\$565	\$1,808
7/26/2017	5.9	Started drafting point III to decertification motion (IJL's "reforms" are irrelevant); finished IJL "reforms" section.	JLN	\$890	\$5,251
7/27/2017	2.9	Discuss daily tasks and case status with KMB and DD; review and edit draft opposition to motion to decertify.	JLM	\$565	\$1,582
7/27/2017	7.5	Started working on point IV (damages need not be proven on class-wide basis); finished point IV in opposition to decertification motion	JLN	\$890	\$6,675
7/27/2017	0.1	Discuss case updates and next steps wtth JLM.	DD	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/27/2017	0.2	Review draft decertification opposition papers.	JGB	\$690	\$138
7/27/2017	0.9	Discuss case opposition brief and next steps with JLM; phone call with potential class member; troubleshoot issues with MailChimp; update class list.	KMB	\$310	\$279
7/28/2017	5.9	Draft and edit opposition to motion to decertify; research issues regarding same.	JLM	\$565	\$3,334
7/28/2017	2.3	Review and edit opposition to motion for decertification.	JGB	\$690	\$1,587
7/28/2017	2.1	Review opposition to motion to decertify and give comments to JLM.	BLG	\$390	\$819
7/28/2017	1.2	Complete weekly review, update, and organization of case files; format co-counsel's brief into firm's brief format; discuss brief and next steps with JLM.	KMB	\$310	\$372
7/29/2017	3.7	Draft and edit opposition to motion to certify; research issues regarding same.	JLM	\$565	\$2,091
7/29/2017	4.5	Started drafting point V to IJL decertification motion (NY GBL).	JLN	\$890	\$4,005
7/30/2017	6.1	Draft and edit opposition to motion to decertify.	JLM	\$565	\$3,447
7/30/2017	6	Cont'd working on point V; finished working on point V.	JLN	\$890	\$5,340
7/31/2017	6.2	Cite check, fact check, and format opposition to decertification motion; discuss same with KMB.	NMG	\$310	\$1,922
7/31/2017	10.8	Discuss weekly tasks and case status with KMB and DD; draft, edit and file brief in opposition to motion to decertify.	JLM	\$565	\$6,046
7/31/2017	4.9	Discuss editing and next steps with JLM; cite edit opposition to motion to decertify; discuss same with KMB.	JL	\$300	\$1,470

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/31/2017	7.8	Monthly review of documents, filings, contacts, and other summary and general case information; review case plan memorandum; insert citations in opposition to Defendants' motion to decertify; prepare exhibits to brief; draft delcaration for JGB; insert edits into opposition brief; insert table of authorities and table of contents into opposiiton brief; file brief with the Court.	KMB	\$310	\$2,418
7/31/2017	2.7	Review and provide thoughts on case plan memorandum; edits to opposition to decertification motion.	JGB	\$690	\$1,863
7/31/2017	0.1	Discuss case updates and plaintiff's argument memorandum with JLM.	DD	\$325	\$33
7/31/2017	3.1	Draft arguement memorandum; review damages letter and decertification motion.	DD	\$325	\$1,008
8/1/2017	0.2	Email exchange with case team re: defendants' request for reply; review letter in opposition to defendants' request.	JGB	\$690	\$138
8/1/2017	1.2	Discuss opposition to motion to decertify the classes; prepare courtesy copies of motion papers for the Court; call clerk re: filing issues; refile opposition brief; finalize and file opposition to Defendants' request to file reply; save, sort, and code documents into case management system.	KMB	\$310	\$372
8/1/2017	0.4	Received defendants' letter motion for leave to reply; received plaintiff's response to defenfants' letter motion for leave.	JLN	\$890	\$356
8/1/2017	0.1	Discuss preparing courtesy copies to the Court.	MWS	\$585	\$0
8/1/2017	3.1	Review letter motion from opposing counsel regarding reply; draft and file opposition to same; review order granting leave to file reply; review filed opposition brief.	JLM	\$565	\$1,752
8/2/2017	2.7	Draft arguement memorandum.	DD	\$325	\$878
8/2/2017	0.1	Discuss case status and next steps with DD.	BLG	\$390	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/3/2017	0.1	Discuss case updates and argument memorandum with JLM.	DD	\$325	\$33
8/4/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31
8/4/2017	0.1	Draft and send weekly plan email.	JLM	\$565	\$57
8/6/2017	0.3	Received Order from Judge Stein decertifying national class.	JLN	\$890	\$267
8/6/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
8/7/2017	4.5	Reviewed defendants' reply brief in support of decertification motion; researched case law cited by defendants' in their reply brief; notes re: same.	JLN	\$890	\$4,005
8/7/2017	0.1	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$310	\$31
8/7/2017	2.7	Review reply brief in further support of motion to decertify; review JGB comments to weekly plan email; discuss next steps with case team.	JLM	\$565	\$1,526
8/8/2017	0.4	Review Defendants' reply brief; email exchange with case team re: sur-reply.	JGB	\$690	\$276
8/8/2017	2.6	Review reply brief in further support of motion to decertify; update motion memorandum regarding same; determine next steps and discuss same with case team.	JLM	\$565	\$1,469
8/9/2017	0.4	Review Defendants' surreply.	KMB	\$310	\$124
8/9/2017	1.9	Update argument memorandum for motion to decertify.	JLM	\$565	\$1,074
8/11/2017	0.2	Draft and send weekly plan email.	JLM	\$565	\$113
8/12/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/14/2017	0.1	Review case plan memorandum.	KMB	\$310	\$31
8/15/2017	0.3	Review motion memorandum on Defendants' motion to decertify; email case team re: same.	JGB	\$690	\$207
8/15/2017	0.7	Update argument memorandum for motion to decertify.	JLM	\$565	\$396
8/20/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
8/21/2017	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$565	\$0
8/21/2017	1.3	Review case plan memorandum; discuss case status and next steps with JLM; phone call with potential class member; save, sort, and code phone note into case management system; update spreadsheet; update mailing list.	KMB	\$310	\$403
8/23/2017	0.8	Phone call with potential class member; update mailing list with email address; update excel spreadsheet with contact information.	KMB	\$310	\$248
8/25/2017	0.1	Draft and send weekly plan email.	JLM	\$565	\$57
8/28/2017	0.1	Review JGB comments to weekly plan email.	JLM	\$565	\$57
8/28/2017	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
9/5/2017	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$310	\$62
9/7/2017	0.3	Listen to voice mail from potential class member; attempt to return call from class member; save, sort, and code phone notes into case management system.	KMB	\$310	\$93
9/8/2017	0.1	Draft and send case plan memorandum to case team.	JLM	\$565	\$57
9/8/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/15/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$310	\$31
9/19/2017	0.1	Review email exchange with case team re: monthly updates.	KMB	\$310	\$31
9/25/2017	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$565	\$0
9/26/2017	0.4	Phone call with potential class member; save, sort, and code phone note into case management system; add email address to monthly update list.	KMB	\$310	\$124
9/29/2017	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$310	\$62
10/4/2017	0.1	Discuss case status and daily tasks with KMB.	JLM	\$605	\$0
10/4/2017	0.8	Email exchange with JLM re: email from potential class member; discuss case status and next steps with JLM; draft monthly update; send monthly update.	KMB	\$325	\$260
10/6/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
10/13/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
10/20/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
10/27/2017	0.1	Complete weekly review, update, and organization of case files;	KMB	\$325	\$33
10/31/2017	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
11/2/2017	1.6	Draft monthly update; email exchange with JLM re: monthly update; purchase mailchimp credits for monthly update; send monthly update to mailing list; phone call with various potential class members; save, sort, and code phone notes into case management system.	KMB	\$325	\$520

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/3/2017	0.8	Complete weekly review, update, and organization of case files; phone call with potential class member; save, sort, and code phone note into case management system.	KMB	\$325	\$260
11/10/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
11/16/2017	1.4	Complete weekly review, update, and organization of case files; return phone call to potential class member; save sort, and phone note into case management system; add email address to monthly mailing list.	KMB	\$325	\$455
11/22/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
11/30/2017	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
12/1/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
12/6/2017	0.2	Draft monthly update; discuss case status and next steps with JLM.	KMB	\$325	\$65
12/6/2017	0.2	Review monthly update; discuss same with KMB.	JLM	\$605	\$121
12/7/2017	0.1	Discuss case status and daily tasks with KMB.	JLM	\$605	\$0
12/8/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
12/11/2017	0.4	Discuss case status and weekly tasks with KMB; edit monthly update; correspond with clients regarding status of case; discuss same with case team.	JLM	\$605	\$182
12/11/2017	0.3	Finalize and email monthly update to all potential class members.	KMB	\$325	\$98
12/15/2017	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/18/2017	0.2	Download It's Just Lunch commercial; save, sort, and code documents into case management system.	KMB	\$325	\$65
12/22/2017	0.2	Monthly review of documents, filings, contacts, and other summary and general case information	KMB	\$325	\$65
1/4/2018	0.1	Discuss case status and next steps with JLM.	KMB	\$325	\$33
1/5/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
1/8/2018	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$605	\$0
1/8/2018	0.3	Discuss case status and next steps with JLM; draft, finalize, and email monthly update to potential class members.	KMB	\$325	\$98
1/9/2018	0.3	Correspond with opposing counsel regarding contact by class member claiming to have received settlement.	JLM	\$605	\$182
1/9/2018	0.2	Email exchange with case team re: settlement with potential class member and next steps.	JGB	\$690	\$138
1/10/2018	0.4	Correspond with opposing counsel regarding contact from class member who claimed he had settled separately with IJL; discuss same with case team.	JLM	\$605	\$242
1/11/2018	0.1	Correspond with Heffler regarding status and next steps.	JLM	\$605	\$61
1/11/2018	0.2	Review email exchange with case team and Heffler re: case status.	KMB	\$325	\$65
1/21/2018	0.1	Email exchange with JLM re: case status.	JGB	\$690	\$69
1/22/2018	0.1	Review email exchange with case team re: case status and next steps.	KMB	\$325	\$33
1/26/2018	0.4	Research issues regarding refund to class members while class action pending.	JLM	\$605	\$242

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/26/2018	0.6	Complete weekly review, update, and organization of case files; phone call with potential class member.	KMB	\$325	\$195
1/29/2018	0.3	Phone call with potential class member; save, sort, and code phone note into case management system.	KMB	\$325	\$98
1/30/2018	0.4	Research issues regarding refunding class members while class action pending; draft and send thoughts regarding same to JGB.	JLM	\$605	\$242
1/31/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
2/2/2018	0.8	Complete weekly review, update, and organization of case files; phone call with potential class member; save, sort, and code phone note into case management system; discuss call and next steps with JLM; update mailing list.	KMB	\$325	\$260
2/5/2018	0.1	Draft monthly update; email JLM draft monthly update.	KMB	\$325	\$33
2/6/2018	0.1	Review JGB correspondence regarding IJL settlement issues.	JLM	\$605	\$61
2/9/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
2/16/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
2/21/2018	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33
2/28/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
3/2/2018	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/5/2018	0.4	Phone call with potential class member; save, sort, and code phone note into case management system.	KMB	\$325	\$130
3/8/2018	0.7	Phone call with former class member; save, sort, and code phone note into case management system; email case team re: call.	KMB	\$325	\$228
3/9/2018	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33
3/15/2018	0.1	Discuss case status and next steps with JLM.	KMB	\$325	\$33
3/16/2018	0.3	Review Thrivest agreement and confirm no update needed; discuss same with MJN.	JLM	\$605	\$182
3/16/2018	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33
3/22/2018	0.2	Discuss follow up with class member with KMB; review email to same.	JLM	\$605	\$121
3/23/2018	0.3	Complete weekly review, update, and organization of case files; email potential class member re: case status.	KMB	\$325	\$98
3/26/2018	0.1	Discuss weekly tasks and case status with KMB.	JLM	\$605	\$0
3/30/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
3/30/2018	0.1	Review voice message from potential class member.	JLM	\$605	\$61
4/3/2018	0.1	Review correspondence regarding recent contact with former class member.	JLM	\$605	\$61
4/4/2018	0.6	Discuss case status and next steps with JLM; draft monthly update; email potential class members monthly update; reivew email exchange with case team re: question from potential class member.	KMB	\$325	\$195

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/4/2018	0.2	Follow up with IJL class member regarding case status; edit monthly case update.	JLM	\$605	\$121
4/5/2018	0.1	Discuss case status and next steps with JLM.	KMB	\$325	\$33
4/6/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
4/13/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
4/18/2018	0.2	Discuss case status and next steps with JLM; email exchange with potential class member re: case status.	KMB	\$325	\$65
4/20/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
4/27/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
4/30/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
5/3/2018	0.1	Discuss daily tasks and case status with KMB.	JLM	\$605	\$0
5/4/2018	0.1	Edit monthly update to class.	JLM	\$605	\$61
5/4/2018	0.1	Edit monthly update to class members.	JLM	\$605	\$61
5/4/2018	0.4	Complete weekly review, update, and organization of case files; draft monthly update; email monthly update to potential class members.	KMB	\$325	\$130
5/8/2018	0.9	Phone call with potential class member; save, sort, and code phone note into case management system; add email address to monthly mailing list.	KMB	\$325	\$293
5/11/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/18/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
5/25/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
5/31/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
6/1/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
6/8/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
6/8/2018	0.2	Review scheduling order regarding motion to decertify class.	JLM	\$605	\$121
6/11/2018	1.1	Discuss case status and next steps with MWS; draft letter to Court re: adjournment of oral argument; insert JGB's edits into letter; file letter with the Court.	KMB	\$325	\$358
6/11/2018	0.3	Review and provide thoughts on case plan memorandum; review and edit letter to Court re: adjournment.	JGB	\$690	\$207
6/11/2018	0.3	Review correspondence regarding motion to decertify argument and scheduling; review letter to the Court regarding same.	JLM	\$605	\$182
6/12/2018	0.6	Email exchange with Court and case team re: oral argument schedule.	JGB	\$690	\$414
6/12/2018	0.4	Review order regarding motion to decertify argument; discuss next steps with JGB; review emails to the Court regarding same.	JLM	\$605	\$242
6/14/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
6/16/2018	0.1	Draft and send weekly case plan memorandum.	JLM	\$605	\$61

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/17/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/18/2018	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$605	\$61
6/18/2018	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$65
6/21/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
6/22/2018	0.1	Draft and send weekly case plan memorandum.	JLM	\$605	\$61
6/24/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/25/2018	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$605	\$61
6/25/2018	0.1	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$33
6/26/2018	0.9	Phone call with potential class member; save, sort, and code phone note into case management system; update class member spreadsheet.	KMB	\$325	\$293
6/29/2018	0.1	Draft and send weekly case plan memorandum.	JLM	\$605	\$61
6/29/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
7/2/2018	0.1	Discuss weekly tasks and case status with KMB.	JLM	\$605	\$0
7/2/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/2/2018	0.4	Review case plan memorandum; discuss case status and next steps with JLM; draft monthly update.	KMB	\$325	\$130
7/6/2018	0.1	Complete weekly review, update, and organization of case files;	KMB	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/6/2018	0.1	Draft and send weekly case plan memorandum.	JLM	\$605	\$61
7/8/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/8/2018	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$605	\$61
7/9/2018	0.7	Discuss weekly tasks and case status with KMB; edit monthly update to clients; discuss same with clients; prepare for motion to decertify oral argument; supervise filing of request for electronic devices orders; review client correspondence and discuss response with KMB; edit monthly update to class.	JLM	\$605	\$363
7/9/2018	1.3	Review case plan memorandum; discuss case status and next steps with JLM; send out monthly updates to potential class members; email exchange with potential class members; install IJL email account on JLM's computer; update Dropbox.	KMB	\$325	\$423
7/11/2018	0.7	Prep for argument	JGB	\$690	\$483
7/12/2018	1.6	Review papers for upcoming argument.	JGB	\$690	\$1,104
7/13/2018	6.4	Discuss case status and weekly tasks with KMB; draft and send weekly case plan memorandum; draft motion to decertify argument memorandum; met with JGB to prepare for motion to decertify argument.	JLM	\$605	\$3,812
7/13/2018	2.4	Prepare for oral argument with JLM.	JGB	\$690	\$1,656
7/13/2018	1.1	Complete weekly review, update, and organization of case files; discuss case status and next steps with JLM; update dropbox.	KMB	\$325	\$358
7/14/2018	1.9	Prepare for oral argument; email exchange with case team re: argument memorandum.	JGB	\$690	\$1,311
7/14/2018	2.7	Draft and edit motion to decertify argument memorandum.	JLM	\$605	\$1,634

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/15/2018	1.9	Review argument memorandum; prepare for oral argument.	JGB	\$690	\$1,311
7/15/2018	4.7	Edit and finalize motion to decertify argument memorandum.	JLM	\$605	\$2,844
7/16/2018	6.4	Discuss case status and weekly tasks with KMB and EMC; review JGB comments to weekly case plan memorandum; prepare for motion to decertify oral argument; meet with JGB regarding same; represent class at motion to decertify oral argument; discuss next steps with JGB.	JLM	\$605	\$3,812
7/16/2018	3.8	Reveiw Motion to Decertify class; Attend oral argument for class certification.	EMC	\$325	\$1,235
7/16/2018	4.6	Review case plan memorandum; discuss case status and next steps with JLM; prepare hard copies of documents for oral argument; update Dropbox; search for cites for JGB; attend oral argument; save, sort, and code documents into case management system; discuss oral argument and next steps with case team.	KMB	\$325	\$1,495
7/16/2018	6.1	Review and provide thoughts on case plan memorandum; prepare for oral argument; discuss oral argument and next steps with JLM; advocate for clients at oral argument.	JGB	\$690	\$4,209
7/17/2018	0.6	Phone call with potential class member; save, sort, and code phone note into case management system; update mailing list with contact information.	KMB	\$325	\$195
7/17/2018	0.4	Research issues regarding appeal from any decision on motion to decertify; discuss client update with KMB.	JLM	\$605	\$242
7/18/2018	0.1	Discuss case status and next steps with EMC.	BLG	\$415	\$0
7/20/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/20/2018	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33
7/20/2018	0.3	Draft and send weekly case plan memorandum; review JGB comments to weekly case plan memorandum.	JLM	\$605	\$182
7/23/2018	1.6	Review case plan memorandum; discuss case status and next steps with JLM; phone call with potential IJL class members; save, sort, and code phone notes into case management system; update email list for monthly updates; call clerk re: withdrawing SS from action; email exchange with JGB re: same.	KMB	\$325	\$520
7/25/2018	0.1	Discuss case status and next steps with BLG.	KMB	\$325	\$33
7/25/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$415	\$0
7/27/2018	0.1	Draft and send case plan memorandum to case team.	BLG	\$415	\$42
7/27/2018	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33
7/30/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/31/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
8/3/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
8/6/2018	3.2	Review and analyze decision re: class certification; discuss same, related issues, and next steps with case team.	MWS	\$625	\$2,000
8/6/2018	0.9	Review decertification order; email case team re: thoughts on decision and next steps.	JGB	\$690	\$621

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/6/2018	1.1	Save, sort, and code documents into case management system; review order; email exchange with case team re: case status and next steps.	KMB	\$325	\$358
8/6/2018	0.8	Email MWS about next steps and thoughts following class certification order.	BLG	\$415	\$332
8/7/2018	5.3	Analyze damages model issues relevant to class certification decision; research re: same; discuss same with case team.	MWS	\$625	\$3,313
8/7/2018	0.6	Email exchange with case team re: next steps; discuss at length with MWS.	JGB	\$690	\$414
8/7/2018	0.5	Email exchange with CAR re: court documents; search for and email various court filed documents	KMB	\$325	\$163
8/8/2018	0.9	Discuss class notice scheduling with opposing counsel; discuss same and related issues, including damages model, with case team; discuss case plan memorandum with JGB.	MWS	\$625	\$563
8/8/2018	1.4	Research re-opening discovery in class actions and duties to de-certified class members; discuss the same with MWS.	BLG	\$415	\$581
8/8/2018	1.4	Email exchange with case team re: case status and next steps; review relevant authorities from Court decision; email exchange with co-counsel re next steps.	JGB	\$690	\$966
8/8/2018	0.3	Discuss case status and next steps with BLG; review email exchange with case team re: opening discovery.	KMB	\$325	\$98
8/8/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$415	\$0
8/9/2018	0.2	Draft case plan memorandum; discuss class notice scheduling with opposing counsel.	MWS	\$625	\$125

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/9/2018	0.4	Review email exchange with case team and opposing counsel re: opening discovery; review email exchange with case team re: next steps.	JGB	\$690	\$276
8/10/2018	0.9	Email co-counsel re: case status and next steps; review and provide thoughts on case plan memorandum.	JGB	\$690	\$621
8/10/2018	0.6	Complete weekly review, update, and organization of case files; edit and finalize notice of appearance for MWS; file notice of appearance; edit notice and proposed order of appearance for SS; email exchange with JGB and SS re: same.	KMB	\$325	\$195
8/13/2018	0.3	Discuss case status and next steps with JGB and BLG.	MWS	\$625	\$188
8/13/2018	2.2	Research and email case team regarding what to do for expert; research other cases where expert discovery opened after class certification decision.	BLG	\$415	\$913
8/13/2018	0.9	Discuss case status and next steps with MWS; email exchange with case team re: expert and next steps.	JGB	\$690	\$621
8/13/2018	0.2	Review case plan memorandum; discuss case status and next steps with BLG.	KMB	\$325	\$65
8/13/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$415	\$0
8/15/2018	1.2	Discuss case with MWS and JGB.	BLG	\$415	\$498
8/15/2018	2.7	Discuss updates and next steps with BLG; research top ten dating applications and websites; draft memorandum re: same; discuss same with BLG.	JL	\$325	\$878
8/15/2018	0.4	Discuss case status, evidence issues, and next steps with case team.	JGB	\$690	\$276
8/15/2018	0.7	Discuss class certification and model issues with case team; discuss class notice scheduling with opposing counsel.	MWS	\$625	\$438

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/16/2018	0.3	Discuss class notice adjournment with opposing counsel; discuss stipulation re: same with case team.	MWS	\$625	\$188
8/16/2018	1.1	Discuss case status and next steps with MWS; draft letter to the court requesting extension of time; circulate same to case team and opposing counsel; discuss filing of same with KMB.	NLG	\$320	\$352
8/16/2018	0.4	Finalize and file motion to extend time to file notice to class and SS's withdrawal of appearance; save, sort, and code documents into case management system.	KMB	\$325	\$130
8/17/2018	1.5	Review and analyze class certification briefing relevant to damages model issues; discuss same with case team; draft case plan memorandum.	MWS	\$625	\$938
8/17/2018	0.3	Discuss case with MWS and JGB.	BLG	\$415	\$125
8/17/2018	0.2	Complete weekly review, update, and organization of case files; email exchange with MWS re: class notice.	KMB	\$325	\$65
8/19/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
8/20/2018	0.5	Discuss damages models and related strategic issues with case team.	MWS	\$625	\$313
8/20/2018	1.3	Review case plan memorandum; discuss case status and next steps with MWS; search for previous class notice; review court transcript re: class notice; draft amended class notice and letter to the court.	KMB	\$325	\$423

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/21/2018	1.6	Review Court order regarding what states are included, cross reference same with briefing, and determine what states have not been mentioned thus far regarding benefit of the bargain, out of pocket, or hybrids; discuss same with MWS; ask KMB to cross reference states not mentioned to determine if there are class members in those states.	BLG	\$415	\$664
8/21/2018	0.1	Email exchange with case team re: class notice.	JGB	\$690	\$69
8/21/2018	2.2	Discuss damages model and related issues with case team; discuss related issues with claims administrator; revise draft class notice; discuss same with case team.	MWS	\$625	\$1,375
8/21/2018	0.8	Discuss case status and next steps with BLG; review email exchange with MWS and administrator; search for IJL members from benefit of the bargain states.	KMB	\$325	\$260
8/21/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$415	\$0
8/22/2018	2.8	Research states and whether they are ut of pocket damage states or benefit of the bargain states.	BLG	\$415	\$1,162
8/22/2018	1.3	Review and edit class notice; discuss case status and next steps with case team.	JGB	\$690	\$897
8/22/2018	0.6	Discuss case status and next steps with BLG; insert edits into case notice; email letter to court and class notice to MWS; save, sort, and code documents into case management system.	KMB	\$325	\$195
8/22/2018	1.9	Discuss class notice with case team and opposing counsel; discuss potential claims available to CDCA action with JGB; research re: same.	MWS	\$625	\$1,188
8/22/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$415	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/23/2018	1.3	Discuss class notice, mediation, and related issues with case team; discuss draft client update with KMB; discuss proposed class notice with opposing counsel.	MWS	\$625	\$813
8/23/2018	3.6	Draft memo including research of missing states; review previously brief states after finding two states that were improperly labeled as benefit of the bargain states when they were actually hybrid states; discuss same with MWS.	BLG	\$415	\$1,494
8/23/2018	0.3	Email exchange with case team re: next steps and possibility of settlement.	JGB	\$690	\$207
8/23/2018	0.6	Discuss case status and next steps with MWS; look to see how many members were registered under hybrid states; email BLG member numbers.	KMB	\$325	\$195
8/24/2018	3.8	Draft case plan memorandum; discuss class notice scheduling and related issues with case team and opposing counsel; review letter to court re: extension of time; discuss same with opposing counsel; discuss statute of limitations issues with opposing counsel; discuss same and related research with case team; review draft class notice edits by opposing counsel; discuss same with case team.	MWS	\$625	\$2,375
8/24/2018	1.3	Monthly review of documents, filings, contacts, and other summary and general case information; discuss case status and next steps with BLG; phone call with opposing counsel re: class notice; save. sort, and code phone notes into case management system; research fraud statute of limitations for various states; email MWS re: research.	KMB	\$325	\$423
8/24/2018	0.3	Review class notice and call with opposing counsel, MWS, and KMB.	BLG	\$415	\$125
8/24/2018	0.2	Email exchange with case team re: amended class notice and next steps; review and provide thoughts on case plan memorandum.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
8/24/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$415	\$0
8/28/2018	0.1	Save, sort, and code document into case management system.	KMB	\$325	\$33
9/4/2018	0.1	Discuss proposed class notice with opposing counsel.	MWS	\$670	\$67
9/4/2018	0.12	Review case plan memorandum; discuss case status and next steps with MWS.	KMB	\$325	\$39
9/5/2018	0.2	Discuss potential settlement and draft class notice with opposing counsel.	MWS	\$670	\$134
9/5/2018	0.1	Discuss case status and next steps with BLG	KMB	\$325	\$33
9/5/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
9/6/2018	1.1	Discuss proposed notice of claim with claim administrator, case team, and opposing counsel; discuss revisions to same with KMB; discuss potential settlement with case team.	MWS	\$670	\$737
9/6/2018	0.3	Email exchange with case team re: class notice and next steps.	JGB	\$690	\$207
9/6/2018	0.3	Line edit draft of class action notice.	EDS	\$325	\$98
9/6/2018	3.6	Discuss case status and next steps with MWS; review and edit class notices; call ECF help desk re: filing class notice; edit letter re: class notice schedule; phone call with opposing counsel re: class notice and settlement; save, sort, and code phone note into case management system; follow up with administrator re: class notice and telephone number; email opposing counsel redline version of class notice; finalize and file class notice with the Court.	KMB	\$325	\$1,170
9/7/2018	0.4	Draft case plan memorandum; discuss potential settlement with case team.	MWS	\$670	\$268
9/7/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/9/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
9/10/2018	0.2	Review case plan memorandum; discuss case status and next steps with MWS.	KMB	\$325	\$65
9/11/2018	0.1	Email exchange with case team re: next steps and settlement.	JGB	\$690	\$69
9/14/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
9/14/2018	0.2	Draft case plan memorandum.	MWS	\$670	\$134
9/17/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
9/17/2018	0.2	Review case plan memorandum; discuss case status and next steps with MWS.	KMB	\$325	\$65
9/18/2018	0.1	Discuss case status and next steps with BLG.	KMB	\$325	\$33
9/18/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
9/19/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
9/21/2018	0.3	Draft case plan memorandum.	MWS	\$670	\$201
9/21/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
9/24/2018	0.3	Review case plan memorandum; discuss case status and next steps with MWS and JGB.	KMB	\$325	\$98
9/25/2018	0.2	Email exchange with case team re: case status and next steps.	JGB	\$690	\$138
9/28/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
9/28/2018	0.2	Draft case plan memorandum.	MWS	\$670	\$134
9/28/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/1/2018	0.2	Review draft client update; discuss same with KMB.	MWS	\$670	\$134
10/1/2018	6.1	Review complaint; discuss case status and next steps with MWS; research elements of causes of action in complaint and compile authorities; review class certification order, motion for summary judgment order, and Norinsberg declaration; discuss statement of facts with KMB; discuss jurisdiction and venue with case team and research applicable statutes and rules; draft outline for updated complaint.	NLG	\$325	\$1,983
10/1/2018	0.4	Review case plan memorandum; discuss case status and next steps with MWS; draft monthly update; email draft monthly update to MWS.	KMB	\$325	\$130
10/1/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/2/2018	2	Discuss case status and next steps with BLG; research elements of claims; research alter ego liability; review document record for relevant details; discuss relevant information, claims, and composition of parties with KMB and MWS.	NLG	\$325	\$650
10/2/2018	0.1	Email exchange with case team re: monthly update.	KMB	\$325	\$33
10/3/2018	0.4	Discuss CDCA complaint with NLG; review and analyze same; review and analyze previous communications and comments concerning draft re: same.	MWS	\$670	\$268
10/3/2018	0.2	Email exchange with case team re: monthly update and responses.	JGB	\$690	\$138
10/3/2018	0.3	Email monthly update to potential class members.	KMB	\$325	\$98

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/3/2018	6.6	Discuss case status and next steps with BLG; review facts listed in complaint; organize and draft outline for same; discuss facts, claims, and class members with MWS; draft outline for statement of facts; review monthly update; discuss same with KMB; draft email response to class members re: monthly update; email exchange with case team re: same.	NLG	\$325	\$2,145
10/3/2018	0.1	Discuss case status and next steps with NLG.	BLG	\$445	\$0
10/3/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
10/4/2018	0.4	Email exchange with case team re: updating potential class members; review and edit email to potential class members.	JGB	\$690	\$276
10/4/2018	4.2	Discuss case status and next steps with case team; review responses to monthly update email; search thunderbird, case management system, and spreadsheets for time and place of contract signing for each respondent; draft, edit, and circulate draft response email to case team; email exchange with case team re: further responses; coordinate with MJN and KMB to set up IJL email account on workstation; draft and send responses to each class member that responded to the monthly update re: whether or not their claims will proceed to trial; draft complaint.	NLG	\$325	\$1,365
10/5/2018	0.6	Multiple email exchanges with case team re: draft complaint and correspondence with class members; provide thoughts on draft complaint to case team.	JGB	\$690	\$414
10/5/2018	0.8	Complete weekly review, update, and organization of case files; discuss response to potential class member; email potential class member; meet with case team re: case status and next steps.	KMB	\$325	\$260

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/5/2018	6.7	Discuss case status and next steps with BLG; draft email to named plaintiff re: Court decision barring claims from proceeding to trial; email exchange and discussion with case team re: same; review document records and correspondence with named plaintiff to determine state and date of entry into contract with Defendant; search records, correspondence, and notes from phone conversations for contract entry information of potential class member; discuss following up with potential class member with KMB and MWS; discuss complaint status with MWS; draft complaint outline; discuss complaint next steps with KMB and MWS; research jurisdiction and venue statutes; research Central District of California local rules for class action.	NLG	\$325	\$2,178
10/5/2018	0.1	Discuss case status and next steps with NLG.	BLG	\$445	\$0
10/8/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/9/2018	0.6	Attention to CDCA complaint; discuss same with case team.	MWS	\$670	\$402
10/9/2018	0.5	Review case plan memorandum; discuss case status and next steps with MWS and JGB; assist NLG with edits.	KMB	\$325	\$163
10/9/2018	8.2	Discuss case status and next steps with MWS; update document and expense records in case management system; draft complaint; multiple email exchanges and discussions with case team re: complaint; review document records for relevant facts and claims; research elements of claims; research proper central district of California theory for class action allegations; compile citations to order and affidavit; email exchange with JGB re: correspondence with class members; circulate relevant case documents to class members and case team; discuss list of relevant dates and geographic limitations with KMB.	NLG	\$325	\$2,665

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/10/2018	2.5	Attention to CDCA complaint; discuss same with case team.	MWS	\$670	\$1,675
10/10/2018	0.5	Email exchanges with case team re: draft complaint.	JGB	\$690	\$345
10/10/2018	7.5	Enter edits into draft complaint; format to comply with CACD rules; add facts and citations from declaration and certification order; research number of class members; discuss facts with KMB; discuss edits with DAF; email exchange with case team re: inclusion of Franchises; discuss EFTA claims with DAF; email exchange with case team re: edits and next steps.	NLG	\$325	\$2,438
10/10/2018	3.2	Discuss matter and next steps with MWS; research case law re: the EFTA and CARD Acts and discuss the same with MWS; edit draft complaint and correspond with case team re: the same.	DAF	\$345	\$1,104
10/11/2018	1.4	Review and provide thoughts on JLN edits to complaint; email exchanges and discussions with case team re: same.	JGB	\$690	\$966
10/11/2018	1.2	Attention to CDCA complaint; discuss same with case team.	MWS	\$670	\$804
10/11/2018	3.6	Enter JLN edits into complaint; circulate JLN edits and comments to JGB; assist DAF in entering JGB edits into complaint; multiple email exchanges and discussions with case team re: draft complaint; edit complaint for formatting and grammar; discuss next steps with MWS.	NLG	\$325	\$1,170
10/11/2018	2.4	Discuss matter and next steps with MWS; enter edits into draft complaint; discuss edits with NLG; research incorporation details of Defendant.	DAF	\$345	\$828
10/12/2018	0.8	Review and provide thoughts on draft complaint; provide edits to same; multiple email exchanges re: claims and factual allegations in complaint.	JGB	\$690	\$552

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/12/2018	3.9	Discuss matter and next steps with BLG; research California consumer fraud statutes re: draft complaint and draft and edit the same; incorporate edits to draft complaint and discuss the same with MWS.	DAF	\$345	\$1,346
10/12/2018	1.6	Draft case plan memorandum; attention to CDCA complaint; discuss same with case team.	MWS	\$670	\$1,072
10/12/2018	2.7	Discuss case status and next steps with BLG; review document circulated by JLN; discuss case status and next steps with MWS; update notes from phone conversations in case management system; discuss updates to complaint with DAF; enter edits into draft complaint; discuss and revise formatting of same; multiple email exchanges and discussions with case team re: draft complaint edits and next steps.	NLG	\$325	\$878
10/14/2018	0.3	Review draft complaint; discuss same with DAF.	MWS	\$670	\$201
10/15/2018	0.4	Discuss question from class member re: next steps with KMB; review draft language re: same.	MWS	\$670	\$268
10/15/2018	0.9	Discuss matter and next steps with JGB and MWS; edit draft complaint and draft update to case team re: the same.	DAF	\$345	\$311
10/15/2018	0.4	Phone call with potential class member re: status of class action; save, sort, and code phone note into case management system; email potential class member re: status update.	KMB	\$325	\$130

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/15/2018	1.9	Review updated draft complaint; update document and expense records in case management system; email exchange and discussion with case team re: circulation of draft complaint; discuss case status and next steps with MWS; discuss outstanding issues with DAF; draft memorandum re: issues to address before filing complaint; circulate draft complaint to opposing counsel; email exchange with MJN re: circulation to JLN; circulate draft complaint to alternate JLN email address; email exchange with MJN and JGB re: JLN email addresses; discuss draft memorandum with MWS.	NLG	\$325	\$618
10/17/2018	0.1	Email exchange with potential class member re: certification order.	KMB	\$325	\$33
10/18/2018	2.2	Discuss case status and editing evidence table to DAF; edit evidence table; add potential IJL class member to email list.	KMB	\$325	\$715
10/18/2018	0.1	Discuss evidence table with JGB and KMB.	DAF	\$345	\$35
10/18/2018	0.1	Discuss case status and next steps with DAF.	NLG	\$325	\$33
10/19/2018	0.4	Email exchange with case team re: litigation hold letter; prepare for settlement call.	JGB	\$690	\$276
10/19/2018	2	Draft case plan memorandum; discuss litigation hold letter with case team; coordinate preparation and service of same; review and revise same.	MWS	\$670	\$1,340
10/19/2018	3.2	Discuss case status and next steps with BLG; email exchange with case team re: litigation hold letter; draft same; circulate to case team and enter edits; circulate to opposing counsel; update document records in case management system.	NLG	\$325	\$1,040
10/19/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
10/24/2018	0.3	Create conference call and circulate dial-in information to participants.	NLG	\$325	\$98

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/26/2018	0.5	Create conference call and circulate dial-in information to participants; attend and record notes on conference call; save notes in case management system; email exchange with case team re: next steps; update expense records in case management system; email exchange with case team re: prior funding agreement.	NLG	\$325	\$163
10/28/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/29/2018	0.1	Review case plan memorandum.	KMB	\$325	\$33
10/30/2018	0.1	Discuss prior funding agreement with MWS.	NLG	\$325	\$33
10/31/2018	0.7	Discuss CDCA action and next steps with case team; review files and research re: relevant Supreme Court decision; discuss same with case team.	MWS	\$670	\$469
10/31/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
11/2/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
11/5/2018	0.3	Email exchange with case team re: scope of class.	JGB	\$690	\$207
11/5/2018	1	Review and analyze SCOTUS China Agritech v. Resh decision for issues related to scope of new action; discuss same with case team.	MWS	\$670	\$670
11/5/2018	0.1	Review case plan memorandum.	KMB	\$325	\$33
11/5/2018	0.1	Discuss case status and next steps with MWS.	NLG	\$325	\$33
11/6/2018	1.6	Email exchanges and discussions with case team re: statute of limitations issues and new class definition; review and provide thoughts on draft complaint.	JGB	\$690	\$1,104
11/6/2018	0.1	Discuss case status and next steps with NLG.	BLG	\$445	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/6/2018	2.6	Attention to updated Riverside complaint and related issues re: CDCA action; discuss same with case team; review and revise complaint.	MWS	\$670	\$1,742
11/6/2018	0.3	Search for potential plaintiff; email case team re: same.	KMB	\$325	\$98
11/8/2018	0.4	Email exchanges with case team re: updated class definition.	JGB	\$690	\$276
11/9/2018	1.3	Enter JLN edits into draft complaint; email exchange with MWS re: same; confirm previous Riverside definition with MWS; enter further edits into draft complaint; create redlines of same; circulate same to case team.	NLG	\$325	\$423
11/9/2018	6.3	Complete weekly review, update, and organization of case files; discuss case status and next steps with MWS; search for people who signed engagement letters; determine if clients are part of the class; discuss issues with MWS.	KMB	\$325	\$2,048
11/11/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
11/12/2018	0.2	Review case plan memorandum; discuss case status and next steps with MWS.	KMB	\$325	\$65
11/12/2018	0.8	Determine if all engaged clients are still members of SDNY action.	KMB	\$325	\$260
11/13/2018	0.3	Email exchange with Court re: status conference; discuss same with case team.	JGB	\$690	\$207
11/13/2018	0.4	Email exchange with David Kaufman from Heffler Claims re: class notice.	NLG	\$325	\$130
11/13/2018	5.4	Discuss case status and next steps with BLG; review phone notes for potential plaintiffs.	KMB	\$325	\$1,755

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/14/2018	2.3	Review court order regarding decertification; review class notice; coordinate sending of same with class administrator; discuss preparation for conference with case team; discuss potential trial dates with case team.	JLM	\$650	\$1,495
11/14/2018	0.6	Review proposed notice; review memo regarding upcoming argument	JGB	\$690	\$414
11/14/2018	1.8	Discuss case status and next steps with BLG; phone call with Heffler Claims re: class notice; record notes on same; save notes in case management system; email exchange with case team re: logistics of notice and next steps; email exchange and discussion with EDS re: estimates of class size and individual recovery amount.	NLG	\$325	\$585
11/15/2018	0.9	Review correspondence and recent decisions and order in case to update myself following leave.	JLM	\$650	\$585
11/16/2018	2.1	Draft and send weekly case plan memorandum; prepare for status conference; review class notice.	JLM	\$650	\$1,365
11/16/2018	0.3	Discuss issues related to class notice with case team.	MWS	\$670	\$201
11/16/2018	0.1	Discuss case status and next steps with NLG.	BLG	\$445	\$0
11/16/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
11/18/2018	1.2	Prepare for status conference; review recent filing in case.	JLM	\$650	\$780
11/19/2018	0.1	Discuss class notice with case team.	MWS	\$670	\$67
11/19/2018	0.2	Discuss case status and next step with JLM.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/19/2018	4.3	Meet with JGB to discuss next steps and prepare for status conference; review class notice and discuss issues regarding data for same with case team; correspond with opposing counsel and claims administrator regarding same; prepare for status conference; represent Plaintiff class at status conference; review Court's proposed class notice and discuss same with case team.	JLM	\$650	\$2,795
11/19/2018	1.5	Travel to SDNY for conference; conference before Judge Stein; travel back to office.	JLN	\$890	\$1,335
11/19/2018	3.6	Review case plan memorandum; discuss case status and next steps with MWS and JLM; prepare documents for status conference; attend status conference; update firm calendars; save, sort, and code documents into case management system; update firm calendars with new court dates.	KMB	\$325	\$1,170
11/20/2018	0.8	Email exchange with case team re: class notice and updating named plaintiffs.	JGB	\$690	\$552
11/20/2018	2.8	Discuss case status and next steps with BLG and JLM; draft updated class notice; draft and email named class plaintiff's update from status conference; search for potential trial witnesses; email potential trial witnesses to JLM; save, sort, and code documents into case management system;	KMB	\$325	\$910
11/20/2018	1.7	Edit class notice and discuss with case team and opposing counsel; edit update to clients; correspond with named Plaintiffs regarding trial preparation plan.	JLM	\$650	\$1,105
11/20/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
11/21/2018	0.3	Email exchange with case team re: trial witnesses; email case team re: general trial prep and notice issues.	JGB	\$690	\$207

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/21/2018	0.6	Complete weekly review, update, and organization of case files; discuss case status and next steps with JLM; edit and finalize letter and amended class notice to the court; file letter to the court;	KMB	\$325	\$195
11/21/2018	1.2	Finalize and file amended class notice; discuss next steps and case status with JGB; draft and send weekly case plan memorandum; correspond with Plaintiff representative.	JLM	\$650	\$780
11/21/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
11/26/2018	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$650	\$0
11/26/2018	0.4	Review case plan memorandum; discuss case status and next steps with JLM; draft monthly update to class members; email draft monthly update to JLM.	KMB	\$325	\$130
11/26/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
11/27/2018	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
11/29/2018	0.4	Review order regarding class notice; update draft class notice.	JLM	\$650	\$260
11/30/2018	0.2	Complete weekly review, update, and organization of case files.	KMB	\$325	\$65
11/30/2018	0.1	Draft and send weekly case plan memorandum.	JLM	\$650	\$65
12/3/2018	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$650	\$0
12/3/2018	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$65
12/4/2018	0.6	Discuss potential local counsel work and other potential local counsels with case team; review and research contacts re: same.	MWS	\$670	\$402
12/4/2018	0.4	Discuss possible funding with funder; discuss with partner	JGB	\$690	\$276

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/4/2018	0.4	Discuss projected expenses for class notice with NLG; review documents concerning the same.	JLM	\$650	\$260
12/4/2018	2.1	Call with JLM re: potential cost and prior method of payment for Heffler claims; discuss approval of class notice with JLM; research prior correspondence with Heffler claims representatives; email exchange with Heffler claims re: payment estimate; call re: same; research payment of prior Heffler invoices; multiple calls with Dave Kaufman re: costs estimate and status thereof.	NLG	\$325	\$683
12/4/2018	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$650	\$65
12/5/2018	0.1	Discuss daily tasks and case status with KMB.	JLM	\$650	\$0
12/5/2018	1	Discuss case status and next steps with JLM; email exchange with Heffler Claims representative re: pricing and follow-up discussions; call with representative re: pricing and payment options; email exchange with case team re: same; update document records in case management system.	NLG	\$325	\$325
12/6/2018	0.3	Draft and send update regarding case status to case team; correspond with opposing counsel regarding class notice.	JLM	\$650	\$195
12/6/2018	0.5	Discuss case status and next steps with MWS; review email exchange with case team re: next steps; draft email to search for potential class members.	KMB	\$325	\$163
12/6/2018	0.1	Discuss case status and next steps with MWS.	NLG	\$325	\$33
12/7/2018	0.7	Email exchange with case team re: case status; discuss with JLM pleading and plaintiffs.	JGB	\$690	\$483

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/7/2018	2.3	Complete weekly review, update, and organization of case files; search for funding agreement; email agreement to JLM; phone call with potential class member; save, sort, and code phone note into case management system; discuss call with case team.	KMB	\$325	\$748
12/7/2018	0.6	Draft and send weekly case plan memorandum; correspond with opposing counsel regarding service lists for class notice; edit proposed update language and discuss same with case team.	JLM	\$650	\$390
12/9/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
12/9/2018	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$650	\$65
12/10/2018	0.1	Email exchange with case team re: case status and next steps.	JGB	\$690	\$69
12/10/2018	0.5	Discuss weekly tasks and case status with KMB; edit monthly update language; discuss same and next steps with case team.	JLM	\$650	\$260
12/10/2018	1.4	Review case plan memorandum; discuss case status and next steps with JLM; edit, finalize and email potential class members class update; email exchanges with potential class members.	KMB	\$325	\$455
12/12/2018	0.1	Discuss case status and daily tasks with KMB.	JLM	\$650	\$0
12/13/2018	0.2	Discuss witness contact progress with KMB.	JLM	\$650	\$130
12/14/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
12/14/2018	0.4	Discuss case status and next steps with JLM.	JGB	\$690	\$276
12/14/2018	0.8	Draft and send weekly case plan memorandum; review data set for service of class notice; discuss same with KMB.	JLM	\$650	\$520

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/16/2018	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
12/16/2018	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$650	\$65
12/17/2018	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$650	\$0
12/17/2018	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$65
12/18/2018	0.1	Email exchange with JLM re: case status.	KMB	\$325	\$33
12/19/2018	0.1	Discuss case status and daily tasks with KMB.	JLM	\$650	\$0
12/19/2018	0.1	Discuss class notice with KMB.	JLM	\$650	\$65
12/19/2018	0.2	Discuss case status and next steps with JLM; review email exchange with case team re: potential settlement.	KMB	\$325	\$65
12/20/2018	0.4	Review email exchange with case team re: letter to magistrate judge; call with claims administrator re: status of class notice.	KMB	\$325	\$130
12/20/2018	0.8	Discuss settlement issues with JGB; follow up regarding timing of class notice and opt out issues; review transcript of conference.	JLM	\$650	\$520
12/21/2018	1.4	Draft and send weekly case plan memorandum; discuss settlement issues with JGB; follow up with case team regarding timing of class notice; discuss same with JGB.	JLM	\$650	\$910
12/21/2018	1.2	Discuss settlement and case status with case team.	JGB	\$690	\$828
12/21/2018	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
12/22/2018	0.1	Review correspondence with opposing counsel regarding settlement.	JLM	\$650	\$65

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/26/2018	0.4	Review correspondence regarding settlement issues; discuss timing of service of class notice with case team; review JGB comments to weekly case plan memorandum.	JLM	\$650	\$260
12/26/2018	0.3	Review and provide thoughts on case plan memorandum; email exchange with opposing counsel re: settlement; email exchange with case team re: settlement and next steps.	JGB	\$690	\$207
12/27/2018	0.2	Review correspondence regarding settlement issues.	JLM	\$650	\$130
12/27/2018	0.4	Email exchange with co-counsel and case team re: settlement, notice, and next steps.	JGB	\$690	\$276
12/27/2018	0.1	Review email exchange with case team re: settlement and next steps.	KMB	\$325	\$33
12/28/2018	0.3	Review correspondence regarding settlement conference.	JLM	\$650	\$195
12/28/2018	1.4	Phone call with opposing counsel re: settlement; email exchange with case team re: call and next steps; email opposing counsel re: settlement and drafting a letter to the Court.	JGB	\$690	\$966
12/28/2018	0.2	Review email exchange with case team and co-counsel re: settlement and next steps; review email exchange with case team and opposing counsel re: settlement terms.	KMB	\$325	\$65
12/30/2018	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
12/31/2018	0.5	Draft and send weekly case plan memorandum; review correspondence regarding settlement conference; coordinate service of class notice; discuss same with NLG.	JLM	\$650	\$325
12/31/2018	0.5	Call with Heffler Claims representative to discuss distribution timing; email exchange with JLM re: same.	NLG	\$325	\$163

Bill Date	Duration	Description	Staff	Rate	Billed Amount
12/31/2018	1.3	Review and provide thoughts on case plan memorandum; email exchange with opposing counsel and co-counsel re: settlement discussions with magistrate judge; discuss settlement with partner and outside counsel.	JGB	\$690	\$897
1/1/2019	0.3	Discuss next steps with partners	JGB	\$690	\$207
1/2/2019	1.3	Discuss settlement with co-counsel and outside counsel and case team; email exchange with case team re: mediation schedule and next steps.	JGB	\$690	\$897
1/2/2019	1.7	Discuss case status and next steps with JLM; multiple discussions and email exchanges with case team re: settlement conference date; update document records in case management system; call with magistrate judge's office re: settlement conference date; email exchange with Heffler claims representative re: same; follow up with case team re: settlement conference.	NLG	\$325	\$553
1/2/2019	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$65
1/3/2019	0.9	Email exchange with case team re: settlement conference date.	JGB	\$690	\$621
1/3/2019	0.2	Email exchange with case team re: mediation and next steps.	JGB	\$690	\$138
1/3/2019	0.3	Discuss case status and next steps with JLM; file letter with the court; save, sort, and code documents into case management system.	KMB	\$325	\$98
1/3/2019	0.4	Correspond with opposing counsel regarding settlement conference schedule; draft and send letter to Court requesting time for settlement conference; review order granting request.	JLM	\$650	\$260

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/3/2019	1	Discuss case status and next steps with BLG; email exchanges and phone calls with JLM re: settlement conference date; call with courtroom deputy to confirm same; draft letter to the Court re: order and revising ordered settlement conference date.	NLG	\$325	\$325
1/3/2019	0.1	Discuss case status and next steps with NLG.	BLG	\$445	\$0
1/4/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
1/4/2019	0.1	Discuss case status and next steps with JLM.	NLG	\$325	\$33
1/6/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
1/7/2019	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$65
1/10/2019	0.1	Discuss settlement letter and next steps with BLG and JLM.	KMB	\$325	\$33
1/10/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/11/2019	0.4	Complete weekly review, update, and organization of case files; discuss case status and next steps with JLM; email potential class members.	KMB	\$325	\$130
1/11/2019	0.1	Discuss daily tasks and case status with KMB.	JLM	\$650	\$0
1/13/2019	0.1	Review case plan memorandum.	JGB	\$690	\$69
1/14/2019	0.2	Discuss weekly tasks and case status with KMB; review language for client update.	JLM	\$650	\$65
1/14/2019	1.2	Review case plan memorandum; discuss case status and next steps with JLM; draft update emails to named plaintiffs and potential class members.	KMB	\$325	\$390
1/15/2019	1.1	Review confidential mediation statement; discuss same with KMB.	JLM	\$650	\$715

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/15/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/16/2019	4.2	Discuss case status and next steps with BLG; draft settlement letter; enter JLN's hours for the past two years into case management system.	KMB	\$325	\$1,365
1/16/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/18/2019	1.6	Complete weekly review, update, and organization of case files; email exchanges with various potential IJL class members; finalize and email IJL named plaintiffs re: updated; finalize and email potential class members re: update.	KMB	\$325	\$520
1/18/2019	0.1	Email exchange with potential class member; discuss same with KMB.	JGB	\$690	\$69
1/18/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/21/2019	0.1	Review JGB comments to weekly case plan email.	JLM	\$650	\$65
1/21/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
1/22/2019	2.8	Review case plan memorandum; discuss case status and next steps with JLM; email exchanges with named plaintiffs re: conference call; calls with potential class members; save, sort, and code phone notes into case management system.	KMB	\$325	\$910
1/22/2019	0.8	Discuss case status and weekly tasks with KMB; edit settlement conference letter; discuss same with JGB.	JLM	\$650	\$455
1/23/2019	1.2	Discuss case status and next steps with BLG; follow up with clients re: conference call; phone call with potential class member; save, sort, and code phone note into case management system.	KMB	\$325	\$390
1/23/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/23/2019	0.2	Coordinate call with KMB.	JLM	\$650	\$130

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/24/2019	0.4	Discuss call with clients and next steps with JLM.	JGB	\$690	\$276
1/24/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/24/2019	1.2	Prepare for call with class representatives; call with class representatives regarding settlement conference and status; discuss same with KMB.	JLM	\$650	\$780
1/24/2019	2.3	Discuss case status and next steps with JLM; email JLM a timeline since discovery; contract dates for named plaintiffs; and information re: settlement conference; phone call with named plaintiffs; save, sort, and code phone note into case management system.	KMB	\$325	\$748
1/25/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
1/25/2019	0.2	Discuss case status and weekly tasks with KMB; draft and send weekly case plan memorandum.	JLM	\$650	\$130
1/27/2019	0.1	Review JGB comments to weekly case plan memorandum.	JLM	\$650	\$65
1/27/2019	0.2	Review and provide thoughts on case plan memorandum; email exchange with case team re: settlement letter.	JGB	\$690	\$138
1/28/2019	0.4	Email exchange with case team re: settlement letter and next steps and prep for mediation	JGB	\$690	\$276
1/28/2019	1.3	Review case plan memorandum; discuss case status and next steps with JLM; draft letter to the Court requesting class representatives to appear by phone; coordinate calls with potential class members.	KMB	\$325	\$423
1/28/2019	0.4	Email exchange with MJN re: potential new client; email exchange and discussion with KMB re: following up with same.	NLG	\$325	\$130

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/28/2019	0.9	Discuss case status and weekly tasks with KMB; discuss settlement letter issues with JGB; correspond with JGB regarding same; review correspondence from JLN regarding same; edit settlement letter.	JLM	\$650	\$520
1/29/2019	0.4	Call with clients regarding next steps; discuss alternate settlement measures with case team.	JLM	\$650	\$260
1/29/2019	1.2	Discuss settlement issues with case team; edit letter regarding appearance by phone.	JLM	\$650	\$780
1/29/2019	0.2	Email exchange with case team re: proposed injunctive relief.	JGB	\$690	\$138
1/29/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
1/29/2019	0.9	Discuss case status and next steps with BLG; phone call with potential class member; save, sort, and code phone note into case management system.	KMB	\$325	\$293
1/30/2019	2.7	Discuss case status and daily tasks with KMB; draft and research issues regarding settlement conference letter; discuss same with case team.	JLM	\$650	\$1,690
1/30/2019	0.1	Email exchange with case team re: next steps.	JGB	\$690	\$69
1/30/2019	1.3	Discuss case status and next steps with JLM; call court re: request to appear by phone; file letter with the court; save, sort, and code documents into case management system.	KMB	\$325	\$423
1/31/2019	0.4	Call with potential class representative; discuss same with KMB.	JLM	\$650	\$260
1/31/2019	2.8	Draft and edit confidential settlement letter.	JLM	\$650	\$1,820
1/31/2019	2.1	Discuss case status and next steps with JLM and JLN; review and edit settlement letter; email exchange with opposing counsel re: settlement.	JGB	\$690	\$1,449

Bill Date	Duration	Description	Staff	Rate	Billed Amount
1/31/2019	1.6	Monthly review of documents, filings, contacts, and other summary and general case information; discuss case status and next steps with JLM; edit settlement letter; draft proposed electronic devices order; email to Judge Netburn's chambers.	KMB	\$325	\$520
1/31/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
2/1/2019	1.4	Email exchange with case team re: settlement and settlement letter; discuss status with JLM.	JGB	\$690	\$966
2/1/2019	1.6	Draft and send weekly case plan memorandum to case team; edit settlement letter; meet with JLN to discuss proposed settlement terms; discuss same with JGB.	JLM	\$650	\$1,040
2/1/2019	0.3	Complete weekly review, update, and organization of case files; discuss settlement letter and next steps with JLM.	KMB	\$325	\$98
2/3/2019	0.8	Review and provide thoughts on case plan memorandum; discuss settlement letter and next steps with JLN; review confidential mediation statement.	JGB	\$690	\$552
2/4/2019	0.2	Email exchange with case team re: settlement letter.	JGB	\$690	\$138
2/4/2019	2.5	Discuss case status and weekly tasks with KMB; edit settlement letter; discuss same with case team.	JLM	\$650	\$1,560
2/4/2019	1.1	Review case plan memorandum; discuss case status and next steps with JLM; compile exhibits; finalize settlement letter; draft acknowledgement form; email settlement documents and acknowledgement letter to the Court.	KMB	\$325	\$358
2/4/2019	1	Ignorant reader review/proofread of settlement letter.	PSG	\$670	\$670

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/5/2019	0.7	Email exchange with case team re: settlement conference; email exchange with opposing counsel re: injunctive relief and IJL's financials; review mediation statement.	JGB	\$690	\$483
2/7/2019	1.3	Draft argument memorandum for settlement conference.	JLM	\$650	\$845
2/8/2019	1.6	Complete weekly review, update, and organization of case files; discuss case status and next steps with JLM; follow up with class reps re: settlement conference; update Dropbox.	KMB	\$325	\$520
2/8/2019	1.6	Discuss case status and daily tasks with KMB; draft argument memorandum for settlement conference; confirm availability by phone with class representatives; discuss documents required for appearance with KMB; draft and send weekly case plan memorandum.	JLM	\$650	\$975
2/10/2019	2.3	Review and provide thoughts on case plan memorandum; prepare for settlement conference.	JGB	\$690	\$1,587
2/11/2019	7.8	Review case plan memorandum; discuss case status and next steps with JLM; prepare Surface and iPad for settlement conference; update Dropbox; prepare copies of settlement letters for settlement conference; attend settlement conference.	KMB	\$325	\$2,535
2/11/2019	8.4	Prepare for settlement conference; advocate for clients during settlement conference; discuss settlement with colleagues, partner, and outside counsel.	JGB	\$690	\$5,796
2/11/2019	5.2	Draft and edit settlement conference argument memorandum; research issues regarding referral to magistrate judge; discuss same with case team; discuss case status and weekly tasks with KMB; represent clients at settlement conference; discuss next steps with case team.	JLM	\$650	\$3,315

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/12/2019	0.3	Discuss case status and next steps with BLG; review email exchange with case team re: status of settlement; email class reps re: status of mediation.	KMB	\$325	\$98
2/12/2019	1.3	Email exchange with case team re: settlement offer; discuss settlement with colleagues and partner.	JGB	\$690	\$897
2/12/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
2/13/2019	0.4	Edit settlement term sheet and discuss same with KMB.	JLM	\$650	\$260
2/13/2019	1.7	Email exchange with case team re: settlement terms sheet; review and edit settlement terms sheet; discuss settlement and next steps with case team, partner, and outside counsel.	JGB	\$690	\$1,173
2/13/2019	2.4	Discuss case status and next steps with BLG; draft settlement terms sheet; insert JLM's and JGB's edits into term sheet; email draft term sheet to opposing counsel.	KMB	\$325	\$780
2/14/2019	0.4	Email exchange with case team re: settlement sheet terms.	JGB	\$690	\$276
2/14/2019	0.4	Discuss case status and next steps with JLM; confirm service award; email case team re: same and settlement terms sheet; email opposing counsel re: settlement terms sheet.	KMB	\$325	\$130
2/14/2019	0.3	Review co-counsel comments to term sheet; discuss same with case team.	JLM	\$650	\$195
2/15/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
2/15/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
2/15/2019	0.1	Draft and send weekly case plan memorandum.	JLM	\$650	\$65

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/19/2019	1.1	Discuss case status and weekly tasks with KMB; edit update language to client; draft and edit term sheet.	JLM	\$650	\$650
2/19/2019	0.4	Review case plan memorandum; discuss case status and next steps with JLM; follow up with potential class members re: case status.	KMB	\$325	\$130
2/20/2019	0.4	Discuss case status and next steps with BLG; review redlined term sheet from opposing counsel.	KMB	\$325	\$130
2/20/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
2/20/2019	0.3	Edit update language for class representatives; edit term sheet; discuss same with case team.	JLM	\$650	\$195
2/21/2019	0.4	Review updated term sheet; email JLM re: next steps.	JGB	\$690	\$276
2/21/2019	0.1	Discuss case status and next steps with PSG.	KMB	\$325	\$33
2/22/2019	0.4	Email exchange with case team re: terms sheet and next steps; review and provide thoughts on case plan memorandum.	JGB	\$690	\$276
2/22/2019	1.1	Discuss case status and daily tasks with KMB; correspond with opposing counsel regarding term sheet; finalize terms for same with case team; draft and send weekly case plan memorandum.	JLM	\$650	\$650
2/22/2019	0.5	Complete weekly review, update, and organization of case files; discuss case status and next steps with JLM; edit settlement terms sheet; follow up with potential class member.	KMB	\$325	\$163
2/25/2019	0.1	Email exchange with case team re: term sheet.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
2/25/2019	1.7	Review case plan memorandum; discuss case status and next steps with JLM; phone call with potential class member; save, sort, and code phone note into case management system; draft adjournment letter to the Court; finalize, and email letter to the Court; edit settlement term sheet; finalize and email settlement term sheet to the Court.	KMB	\$325	\$553
2/25/2019	2.1	Discuss case status and weekly tasks with KMB; finalize and file term sheet.	JLM	\$650	\$1,300
2/26/2019	0.1	Email exchange with case team re: cash settlement numbers.	JGB	\$690	\$69
2/26/2019	0.1	Discuss case status and next steps with KMB.	BLG	\$445	\$0
2/26/2019	0.1	Review email exchange with case team re: voucher payment breakdown.	KMB	\$325	\$33
2/26/2019	0.8	Calculate cash settlement numbers; discuss same with case team.	JLM	\$650	\$520
2/27/2019	0.2	Discuss case status and next steps with case team.	JGB	\$690	\$138
2/27/2019	0.2	Review email exchange with case team and opposing counsel re: terms sheet and next steps; update firm calendar with update pre-trial filing deadlines.	KMB	\$325	\$65
2/27/2019	0.4	Correspond with opposing counsel regarding next steps and calculations for cash payments to National Class.	JLM	\$650	\$260
2/28/2019	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
3/1/2019	0.1	Email exchange with case team re: consenting to Netburn for all purposes.	JGB	\$690	\$69
3/1/2019	0.3	Discuss case status and daily tasks with KMB; draft and send weekly case plan memorandum; correspond with opposing counsel regarding settlement cash recovery breakdown.	JLM	\$650	\$130

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/1/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
3/2/2019	0.1	Email exchange with case team re: consent to magistrate judge.	JGB	\$690	\$69
3/3/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
3/4/2019	0.1	Discuss case status and weekly tasks with KMB.	JLM	\$650	\$0
3/4/2019	0.2	Review case plan memorandum; discuss case status and next steps with JLM.	KMB	\$325	\$65
3/5/2019	0.1	Email exchange with case team re: case status.	JGB	\$690	\$69
3/5/2019	0.1	Review correspondence regarding consent to magistrate judge.	JLM	\$650	\$65
3/6/2019	0.1	Discuss case status and daily tasks with KMB.	JLM	\$650	\$0
3/8/2019	0.3	Complete weekly review, update, and organization of case files; draft case plan memorandum.	KMB	\$325	\$98
3/9/2019	0.1	Email exchange with case team re: settlement.	KMB	\$325	\$33
3/11/2019	0.1	Review case plan memorandum; discuss case status and next steps with PSG.	KMB	\$325	\$33
3/11/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
3/12/2019	0.1	Email exchange with case team re: consenting to magistrate judge.	JGB	\$690	\$69
3/15/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
3/18/2019	0.1	Review case plan memorandum.	KMB	\$325	\$33
3/18/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
3/25/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
3/26/2019	0.4	Email exchange with case team re: settlement agreement and next steps; review settlement agreement draft.	JGB	\$690	\$276
3/26/2019	3.1	Discuss case status and next steps with DAF; review email exchange with case team re: settlement agreement; draft settlement agreement.	KMB	\$325	\$1,008
3/27/2019	0.3	Review draft settlement agreement; email exchange with case team re: settlement and next steps.	JGB	\$690	\$207
3/27/2019	0.2	Discuss case status and next steps with PSG; email draft settlement agreement to JLN; review email exchange between case team re: settlement and next steps.	KMB	\$325	\$65
3/27/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
3/28/2019	0.1	Email exchange with case team re: case status.	JGB	\$690	\$69
3/29/2019	0.5	Monthly review of documents, filings, contacts, and other summary and general case information; draft case plan memorandum; edit and email draft joint letter to opposing counsel.	KMB	\$325	\$163
3/29/2019	0.3	Email exchange with co-counsel re: court deadlines and next steps; draft letter to the Court re: extension of dates; discuss same with KMB.	JGB	\$690	\$207
3/29/2019	0.2	Draft JLM's notice and proposed order of withdrawal of appearance.	EDS	\$325	\$65
3/31/2019	0.2	Email exchange with case team re: next steps; email exchange with opposing counsel re: settlement.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/1/2019	0.8	Review and provide thoughts on case plan memorandum; email exchange with opposing counsel re: letter to the Court; review order of court; follow up with co-counsel and adversaries.	JGB	\$690	\$552
4/1/2019	0.8	Review case plan memorandum; discuss case status and next steps with PSG; finalize letter and email to Court; review order; discuss order and next steps with JGB; review email exchange between case team and opposing counsel re: next steps.	KMB	\$325	\$260
4/2/2019	0.6	Email exchange with case and opposing counsel re: settlement and next steps; draft letter to the Court; advocate for clients during court conference call with magistrate judge; discuss consent to magistrate judge form with KMB.	JGB	\$690	\$414
4/2/2019	0.2	Line edit letter to Court re: pre trial filing deadline; discuss same with KMB.	EDS	\$325	\$65
4/2/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
4/2/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
4/2/2019	0.8	Discuss case status and next steps with DAF; draft letter to the court; discuss letter with EDS; finalize and email letter to Court; phone conference with the Court; save, sort, and code phone note into case management system; discuss magistrate consent form with JGB; draft and finalize consent to magistrate judge form; file consent form with the Court.	KMB	\$325	\$260
4/3/2019	0.1	Email exchange with KMB re: case status.	JGB	\$690	\$69
4/4/2019	0.4	Review trial scheduling order; email case team and opposing counsel re: same.	JGB	\$690	\$276
4/4/2019	0.2	Review trial schedule order and email exchange between case team and opposing counsel re: settlement; save, sort, and code documents into case management system.	KMB	\$325	\$65

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/5/2019	0.4	Discuss settlement status and next steps with partner	JGB	\$690	\$276
4/5/2019	0.5	Complete weekly review, update, and organization of case files; update and edit valuation memorandum for Pravati.	KMB	\$325	\$163
4/8/2019	0.1	Save and code JLM's notice of withdrawal into case management system.	EDS	\$325	\$33
4/10/2019	0.1	Save and code order re: JLM withdrawal as attorney into case management system.	EDS	\$325	\$33
4/11/2019	0.5	Discuss settlement agreement with opposing counsel and case team; review and analyze same.	MWS	\$670	\$335
4/11/2019	0.4	Email Peter Shapiro re: case status; email case team re: settlement agreement.	JGB	\$690	\$276
4/12/2019	0.6	Discuss settlement agreement and related issues with case team; review and analyze same.	MWS	\$670	\$402
4/12/2019	0.1	Email case team re: next steps.	JGB	\$690	\$69
4/15/2019	1.6	Discuss settlement agreement with case team and opposing counsel; revise same.	MWS	\$670	\$1,072
4/15/2019	0.1	Email EDS re: email from client.	JGB	\$690	\$69
4/15/2019	0.1	Email JGB re: client email.	EDS	\$325	\$33
4/17/2019	0.3	Discuss settlement agreement with opposing counsel and case team; review same.	MWS	\$670	\$201
4/23/2019	0.5	Discuss settlement agreement with case team and opposing counsel; review same.	MWS	\$670	\$335
4/23/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
4/23/2019	0.2	Review emails between case team and opposing counsel re: settlement; discuss case status and next steps with DAF.	KMB	\$325	\$65

Bill Date	Duration	Description	Staff	Rate	Billed Amount
4/25/2019	0.2	Review email from opposing counsel re: settlement agreement; email exchange with case team re: next steps.	JGB	\$690	\$138
4/25/2019	1.4	Discuss settlement agreement and related issues with case team and opposing counsel.	MWS	\$670	\$938
4/25/2019	0.8	Discuss case status and next steps with MWS; draft update to clients; email proposed settlement agreement and update to clients.	KMB	\$325	\$260
4/26/2019	0.1	Discuss updates to class members with case team.	MWS	\$670	\$67
4/26/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
4/29/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
4/29/2019	0.8	Review case plan memorandum; discuss settlement and next steps with case team; follow up with named plaintiffs re: status of settlement agreement.	KMB	\$325	\$260
4/29/2019	0.1	Discuss updates to class members with case team.	MWS	\$670	\$67
4/30/2019	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65
4/30/2019	0.1	Follow up with opposing counsel re: settlement agreement.	MWS	\$670	\$67
5/1/2019	0.4	Discuss settlement agreement with opposing counsel and case team: review and analyze same.	MWS	\$670	\$268
5/2/2019	0.1	Discuss case status and next steps with DAF.	KMB	\$325	\$33
5/2/2019	0.1	Discuss matter and next steps with KMB.	DAF	\$395	\$0
5/2/2019	0.1	Email opposing counsel re: settlement agreement.	MWS	\$670	\$67
5/3/2019	0.1	Email exchange with KMB re: case status; draft case plan memorandum.	MWS	\$670	\$67

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/3/2019	0.1	Email exchange with case team re: case status.	JGB	\$690	\$69
5/3/2019	0.7	Complete weekly review, update, and organization of case files; email exchange with MWS re: case status; follow up with named plaintiffs re: settlement agreement; email exchange with MWS re: same.	KMB	\$325	\$228
5/6/2019	1.8	Discuss settlement agreement and next steps with KMB; follow up with named plaintiffs re: settlement and conference call; discuss class certification issues with KMB; research re: same; analyze same.	MWS	\$670	\$1,206
5/6/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
5/6/2019	0.8	Review case plan memorandum; discuss case status and next steps with PSG; create and circulate conference call information; discuss settlement and next steps with MWS.	KMB	\$325	\$260
5/6/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/7/2019	0.6	Discuss settlement and next steps with case team; conference call with named Plaintiffs; discuss call and next steps with KMB; email to opposing counsel re: status.	MWS	\$670	\$402
5/7/2019	0.3	Discuss settlement and next steps with case team.	JGB	\$690	\$207
5/7/2019	0.4	Email exchange with case team re: case status and upcoming deadlines; attend conference call with MWS.	KMB	\$325	\$130
5/8/2019	0.2	Email exchange with case team re: settlement agreement.	JGB	\$690	\$138
5/8/2019	0.3	Review updated settlement agreement from defendants; email exchange with case team re: same.	MWS	\$670	\$201

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/9/2019	0.6	Review revised settlement agreement; discuss same and next steps with case team and opposing counsel.	MWS	\$670	\$402
5/10/2019	0.5	Discuss filing of proposed settlement agreement with case team and opposing counsel; supervise and coordinate filing of same; review cover letter re: same; discuss preparation of supporting documents with case team; draft case plan memorandum.	MWS	\$670	\$335
5/10/2019	0.2	Discuss case status and next steps with case team; review and provide thoughts on case plan memorandum.	JGB	\$690	\$138
5/10/2019	1.5	Complete weekly review, update, and organization of case files; discuss case status and next steps with PSG and MWS; draft Exhibit A and B to settlement agreement; discuss settlement agreement line edit with ETK; draft transmittal letter to the Court re: settlement agreement; finalize and file draft settlement letter with the Court.	KMB	\$325	\$488
5/10/2019	2.2	Review and revise settlement agreement; discuss same with KMB.	ETK	\$325	\$715
5/10/2019	0.1	Discuss case status and next steps with KMB.	MWS	\$670	\$67
5/10/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/13/2019	2.2	Review case plan memorandum; discuss case status and next steps with PSG; draft exhibits to settlement agreement; email exhibits to MWS; save, sort, and code documents into case management system.	KMB	\$325	\$715
5/13/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/14/2019	0.4	Review and edit exhibits to settlement agreement.	MWS	\$670	\$268
5/14/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/14/2019	1.1	Discuss case status and next steps with PSG; edit exhibits to settlement agreement; email exhibits to MWS.	KMB	\$325	\$358
5/15/2019	0.2	Discuss case status and next with DAF; email MWS re: exhibits to settlement agreement.	KMB	\$325	\$65
5/15/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
5/15/2019	0.1	Discuss exhibits to settlement agreement with KMB.	MWS	\$670	\$67
5/16/2019	0.1	Email case team re: settlement agreement exhibits.	JGB	\$690	\$69
5/16/2019	0.3	Discuss case status and next steps with PSG; email exhibits to the complaint to opposing counsel.	KMB	\$325	\$98
5/16/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/17/2019	0.2	Follow up with opposing counsel re: settlement exhibits; draft case plan memorandum.	MWS	\$670	\$134
5/17/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
5/19/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
5/20/2019	0.2	Review case plan memorandum; discuss case status and next steps with PSG.	KMB	\$325	\$65
5/20/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/21/2019	0.1	Email exchange with KMB re: call from potential class member.	JGB	\$690	\$69
5/21/2019	0.4	Phone call with potential class member; discuss call with MWS and JGB.	KMB	\$325	\$130
5/23/2019	0.2	Review objection letter filed with the Court; email exchange with case team re: same.	JGB	\$690	\$138

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/23/2019	0.4	Review objection letter filed with the Court; discuss objection letter and next steps with KMB.	MWS	\$670	\$268
5/23/2019	2.6	Review class member's letter in opposition to settlement agreement; discuss letter and next steps with MWS; draft opposition letter; save, sort, and code documents into case management system.	KMB	\$325	\$845
5/24/2019	0.6	Review and provide thoughts on opposition letter to objection; discuss case status and next steps with KMB; follow up with opposing counsel re: status of settlement and court conference call.	MWS	\$670	\$402
5/24/2019	0.3	Review Court order; discuss same with case team.	JGB	\$690	\$207
5/24/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/24/2019	0.2	Assist KMB re: citations for letter regarding firm representation of classes.	EDS	\$325	\$65
5/24/2019	2.4	Discuss case status and next steps with PSG; research issues in opposition letter; discuss citations in letter with EDS; edit opposition letter; review order from the Court; save, sort, and code order into case management system; discuss next steps with MWS.	KMB	\$325	\$780
5/27/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
5/28/2019	0.6	Discuss case status and next steps with case team; discuss prep for court conference with case team; revise argument memo re: same; review files re: same.	MWS	\$670	\$402
5/28/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
5/28/2019	2.1	Review case plan memorandum; discuss case status and next steps with DAF; draft argument memorandum; create and circulate conference call information.	KMB	\$325	\$683

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/29/2019	4.1	Discuss Court conference call and argument memorandum with KMB; review and edit argument memorandum; prepare for call re: same; advocate for client during Court conference call; discuss call and next steps with case team; revise settlement agreement; discuss same and next steps with opposing counsel; discuss motion for preliminary approval with ACB.	MWS	\$670	\$2,747
5/29/2019	0.2	Email exchange with case team re: conference call with the Court.	JGB	\$690	\$138
5/29/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
5/29/2019	0.2	Discuss motion for preliminary approval with MWS.	ACB	\$525	\$105
5/29/2019	4.7	Discuss case status and next steps with PSG; edit argument memorandum; discuss conference call with the Court; attend conference call with the Court; discuss call and next steps with MWS; email case team re: conference call.	KMB	\$325	\$1,528
5/30/2019	0.6	Discuss case status and next steps with KMB; email exchange with case team re: settlement agreement and next steps; revise draft settlement agreement and email opposing counsel re: same.	MWS	\$670	\$402
5/30/2019	0.3	Email exchange with case team re: settlement and next steps.	JGB	\$690	\$207
5/30/2019	4.7	Review Summary Document and Complaint; discuss case history with KMB.	ACB	\$525	\$2,468
5/30/2019	0.4	Discuss case history with ACB; email ACB relevant court documents; discuss settlement with MWS.	KMB	\$325	\$130
5/31/2019	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65

Bill Date	Duration	Description	Staff	Rate	Billed Amount
5/31/2019	0.4	Follow up with opposing counsel re:status of settlement agreement; draft case plan memorandum; discuss update to court with case team.	MWS	\$670	\$268
5/31/2019	3.5	Review Complaint; review Settlement Agreement.	ACB	\$525	\$1,838
6/2/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/3/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
6/3/2019	0.3	Discuss motion for preliminary approval of settlement and related next steps with case team; discuss briefing schedule re: same with case team; email opposing counsel re: same.	MWS	\$670	\$201
6/3/2019	0.2	Review case plan memorandum; discuss case status and next steps with PSG.	KMB	\$325	\$65
6/4/2019	0.1	Discuss schedule and next steps with ETK.	ACB	\$525	\$53
6/4/2019	0.5	Discuss joint scheduling letter and next steps with case team and opposing counsel; revise same.	MWS	\$670	\$335
6/4/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
6/4/2019	0.4	Discuss case status and next steps with DAF and MWS; draft joint letter re: scheduling; email letter to MWS.	KMB	\$325	\$130
6/5/2019	0.2	Email exchange with case team re: joint letter, order, and next steps.	JGB	\$690	\$138
6/5/2019	0.3	Discuss joint status report with case team and opposing counsel; revise same; coordinate finalization and filing of same.	MWS	\$670	\$201
6/5/2019	0.2	Email exchange with case team re: joint letter, order, and next steps.	MWS	\$670	\$134
6/5/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/5/2019	0.3	Discuss case status and next steps with PSG and MWS; review email exchanges between case team and opposing counsel re: joint letter; finalize and file joint letter with the Court; save, sort, and code document into case management system.	KMB	\$325	\$98
6/6/2019	0.6	Discuss brief, briefing schedule, and related issues with case team.	MWS	\$670	\$402
6/6/2019	0.2	Review order from the Court; save, sort, and code documents into case management system; update firm calendars.	KMB	\$325	\$65
6/7/2019	0.7	Draft and email case plan memorandum; discuss case status and next steps with KMB; discuss schedule with ACB.	MWS	\$670	\$469
6/7/2019	0.1	Review case plan memorandum, discuss schedule with MWS; update JGB regarding scheduling and next steps.	ACB	\$525	\$53
6/7/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
6/7/2019	0.2	Complete weekly review, update, and organization of case files; discuss case status and next steps with PSG and MWS.	KMB	\$325	\$65
6/10/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
6/10/2019	0.2	Review case plan memorandum; discuss case status and next steps with PSG.	KMB	\$325	\$65
6/10/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/11/2019	4.2	Discuss settlement agreement and motion for preliminary approval with case team; review and provide comments on draft motion for preliminary approval; review and analyze settlement agreement.	MWS	\$670	\$2,814

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/11/2019	4	Review terms of proposed settlement agreement; draft table of content for motion for preliminary approval; calculate appropriate disbursement sums; discuss disbursement sums and case history with KMB; sent email to MWS regarding settlement distribution calculations.	ACB	\$525	\$2,100
6/11/2019	0.8	Discuss at length settlement, motion for preliminary approval and next steps with MWS and ACB.	KMB	\$325	\$260
6/12/2019	0.6	Discuss settlement agreement and motion for preliminary approval with case team.	MWS	\$670	\$402
6/12/2019	0.3	Discuss procedural history with KMB; review MWS response regarding concerns with settlement language.	ACB	\$525	\$158
6/12/2019	1.2	Discuss settlement agreement and motion for preliminary approval with case team; email ACB timeline of events from last settlement agreement until present; review and provide thoughts on comments in motion for preliminary approval brief.	KMB	\$325	\$390
6/13/2019	0.2	Discuss case status and next steps with case team.	KMB	\$325	\$65
6/13/2019	0.1	Discuss case status and next steps with KMB.	ACB	\$525	\$0
6/14/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/14/2019	0.2	Draft case plan memorandum; discuss briefing and related issues with case team.	MWS	\$670	\$134
6/14/2019	0.1	Complete weekly review, update, and organization of case files	KMB	\$325	\$33
6/17/2019	9.3	Draft Motion for Preliminary Approval; assign research on other state's statutes regarding dating services to JMP; review JMP's research.	ACB	\$525	\$4,883

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/17/2019	2.1	Discuss case status and next steps with ACB; research re: state statutory laws on monetary pricing caps; review citations of settlement agreement, short-form notice, and long-form notice for ACB.	JMP	\$325	\$683
6/17/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
6/17/2019	0.3	Review case plan memorandum; discuss case status and next steps with DAF: discuss motion for preliminary approval with ACB.	KMB	\$325	\$98
6/17/2019	0.1	Discuss preliminary approval brief with ACB; review same.	MWS	\$670	\$67
6/18/2019	0.2	Research re: state statutory laws on monetary pricing caps.	JMP	\$325	\$65
6/18/2019	1.3	Discuss case status and next steps with case team; review draft preliminary approval brief; email ACB re: same.	MWS	\$670	\$871
6/18/2019	2.3	Edit and update motion for preliminary approval; discuss same with KMB.	ACB	\$525	\$1,208
6/18/2019	0.7	Discuss preliminary approval with case team; review and edit motion for preliminary approval.	KMB	\$325	\$228
6/18/2019	0.1	Discuss case status and next steps with KMB.	DAF	\$395	\$0
6/19/2019	2.4	Review MWS comments and redline motion for preliminary approval; discuss changes and next steps with KMB.	ACB	\$525	\$1,260
6/19/2019	0.6	Discuss case status and next steps with ACB; review and edit motion for preliminary approval; discuss same with ACB and ETK.	KMB	\$325	\$195
6/19/2019	1.2	Review and edit citations for memorandum of law for preliminary approval of settlement; discuss same with KMB.	ETK	\$325	\$390

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/20/2019	0.8	Review Opposing Counsel's redline; propose language regarding location information provision by IJL.	ACB	\$525	\$420
6/20/2019	0.7	Discuss case status and next steps with case team; review edits to settlement agreement; discuss same with case team and adversary.	MWS	\$670	\$469
6/20/2019	0.1	Discuss matter and next steps with KMB.	DAF	\$395	\$0
6/20/2019	0.8	Discuss case status and next steps with PSG; review edits from opposing counsel re: settlement agreement discuss settlement agreement with case team.	KMB	\$325	\$260
6/20/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
6/21/2019	0.6	Discuss case status and next steps with case team; draft case plan memorandum; discuss preliminary approval brief with case team; discuss settlement agreement with case team and opposing counsel.	MWS	\$670	\$402
6/21/2019	0.3	Complete weekly review, update, and organization of case files; review ACB's edits to settlement agreement; draft email to opposing counsel re: updated settlement agreement.	KMB	\$325	\$98
6/23/2019	0.1	Review draft brief; discuss same with ACB.	MWS	\$670	\$67
6/24/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$670	\$0
6/24/2019	3.4	Review case plan memorandum; discuss case status and next steps with PSG and ACB; edit motion for preliminary approval.	KMB	\$325	\$1,105
6/24/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
6/24/2019	1.7	Edits to motion for preliminary approval of settlement; circulated document to MWS and JLN; discuss case status with KMB.	ACB	\$525	\$893
6/25/2019	0.7	Discuss motion for preliminary approval with case team; review edits to preliminary approval.	MWS	\$670	\$469

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/25/2019	0.1	Discuss matter and next steps with KMB.	DAF	\$395	\$0
6/25/2019	1.6	Discuss case status and next steps with DAF; review and edit motion for preliminary approval; follow up with named plaintiffs re: status of settlement agreement and next steps; discuss same with case team.	KMB	\$325	\$520
6/26/2019	2.3	Discuss motion for preliminary approval with case team; review and revise same.; review and discuss settlement agreement issues and related issues concerning settlement approval with case team; follow up with opposing counsel re: settlement agreement.	MWS	\$670	\$1,541
6/26/2019	3.5	Edit Motion for preliminary approval; input JLN edits; review and print for MWS to review; discuss edits to exhibits with KMB; discuss language for proposed final order and claim form with KMB; discuss language of settlement agreement, dates, and strategy with KMB and MWS; review and sort emails.	ACB	\$525	\$1,838
6/26/2019	5.4	Discuss case status and next steps with ACB; review and edit motion for preliminary approval; follow up with clients re: status of settlement and next steps; discuss settlement agreement and timing with claims administrator; discuss settlement agreement issues with MWS; edit and finalize settlement agreement; email class members settlement agreement; draft, edit, and finalize affidavits to class members.	KMB	\$325	\$1,755
6/27/2019	3.7	Discuss motion for preliminary approval with case team; email exchange opposing counsel re: settlement agreement; review and edit motion for preliminary approval; coordinate and supervise finalization and filing of same and related documents.	MWS	\$670	\$2,479

Bill Date	Duration	Description	Staff	Rate	Billed Amount
6/27/2019	1.7	Review edits to motion for preliminary approval; discuss bluebook citations with KMB; discuss edits to short and long form notices with KMB; review and sort emails.	ACB	\$525	\$893
6/27/2019	2.2	Review and perform fact check for memorandum of law in support of Plaintiff's motion for preliminary approval of settlement; perform citation check for same.	HS	\$325	\$715
6/27/2019	0.1	Discuss line editing motion for preliminary approval with EDS; discuss case status and next steps with KMB.	PSG	\$670	\$0
6/27/2019	2.2	Discuss line editing motion for preliminary approval with PSG and KMB; line edit motion for preliminary approval; line edit JGB declaration and notice of motion for preliminary approval; assist KMB in editing table of authorities and table of contents in motion for preliminary approval brief.	EDS	\$325	\$715
6/27/2019	0.4	Edit motion for preliminary approval and discuss same with KMB and MWS.	DAF	\$395	\$158
6/27/2019	2.2	Review and perform factual citation check for memorandum of law in support of Plaintiff's motion for preliminary approval of settlement.	ETK	\$325	\$715
6/27/2019	10.6	Discuss case status and next steps with PSG: perform legal citation check; discuss various issues with legal citation check with case team; prepare and finalize exhibits to motion for preapproval; follow up with clients for signed settlement agreement; edit motion for preliminary approval brief and JGB's declaration; create table of contents and table of authorities; verify table of authorities and table of contents with EDS; finalize and file motion for preliminary approval; save, sort, and code documents into case management system.	KMB	\$325	\$3,445
6/28/2019	0.2	Monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$65

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/1/2019	0.2	Review case plan memorandum; save, sort, and cod documents into case management system.	KMB	\$325	\$65
7/3/2019	0.1	Draft case plan memorandum.	MWS	\$790	\$79
7/3/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
7/6/2019	0.3	Email exchange with case team re: case status and next steps.	MWS	\$790	\$237
7/6/2019	0.2	Email exchange with case team re: case status; review and provide thoughts on case plan memorandum.	JGB	\$690	\$138
7/8/2019	0.2	Review email exchange with case team re: case status and next steps; review case plan memorandum; discuss case status with KMB	ACB	\$525	\$105
7/8/2019	0.1	Discuss case status and next steps with KMB.	ACB	\$525	\$0
7/8/2019	0.2	Review email exchange with case team re: case status and next steps; review case plan memorandum; discuss case status with ACB.	KMB	\$325	\$65
7/12/2019	0.1	Draft case plan memorandum.	MWS	\$790	\$79
7/12/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
7/14/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
7/15/2019	0.1	Review case plan memorandum.	KMB	\$325	\$33
7/19/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
7/25/2019	0.5	Discuss potential class members with KMB.	MWS	\$790	\$395
7/25/2019	1.4	Follow up with potential class members; discuss same with MWS.	KMB	\$325	\$455

Bill Date	Duration	Description	Staff	Rate	Billed Amount
7/26/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
7/29/2019	3.8	Call various potential class members; save, sort, and code phone notes into case management system.	KMB	\$325	\$1,235
7/31/2019	0.3	Discuss case status and next steps with ACB; monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$325	\$98
8/2/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
8/9/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
8/16/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$325	\$33
8/21/2019	0.6	Phone call with potential IJL class member; discuss call and next steps with case team; email documents to potential class member.	KMB	\$325	\$195
8/21/2019	0.6	Phone call with potential class member; discuss call and next steps with case team.	MWS	\$790	\$474
8/23/2019	0.2	Complete weekly review, update, and organization of case files	KMB	\$325	\$65
9/3/2019	0.2	Email exchange with case team re: conference call with the Court; email the Court re: call.	MWS	\$890	\$178
9/3/2019	0.1	Email exchange with case team re: conference call with the Court.	JGB	\$690	\$69
9/3/2019	0.1	Review email exchange with case team and the Court re: conference call; update firm calendars re: conference call.	KMB	\$340	\$34

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/4/2019	2.1	Request argument memorandum from previous preliminary approval conference and most recent conference from KMB; draft argument memorandum; discuss with KMB; circulate argument memorandum to case team; review case team emails; sort emails.	ACB	\$560	\$1,176
9/4/2019	0.1	Discuss case status and next steps with KMB.	ACB	\$560	\$0
9/4/2019	0.6	Discuss case status and next steps with ACB; email argument memorandum to ACB; create and circulate conference call information; format and finalize argument memorandum.	KMB	\$340	\$204
9/5/2019	0.6	Discuss conference with case team; review amended settlement documents; discuss client follow up with case team.	JGB	\$690	\$414
9/5/2019	1.1	Advocate for client during court conference call; discuss same with case team; review amended settlement documents; discuss client follow up with case team.	MWS	\$890	\$979
9/5/2019	1.3	Conference call with the Court; save, sort, and code phone notes into case management system; discuss call with case team; edit settlement documents; email edits to case team; email redline to settlement documents to opposing counsel; email lead plaintiff's re: call and amended settlement documents.	KMB	\$340	\$442
9/6/2019	0.2	Email exchange with case team re: amended settlement agreement and next steps; review email exchange between case team and opposing counsel re: same.	MWS	\$890	\$178
9/6/2019	0.4	Complete weekly review, update, and organization of case files; email exchange with opposing counsel and case team re: status of settlement agreement.	KMB	\$340	\$136
9/8/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/8/2019	0.1	Draft and send case plan memorandum to case team.	MWS	\$890	\$89
9/9/2019	0.1	Discuss status of settlement agreement with case team.	MWS	\$890	\$89
9/9/2019	0.5	Review case plan memorandum; discuss case status and next steps with PSG; follow up with case team re: case status; follow up with clients re: signed settlement agreement.	KMB	\$340	\$170
9/10/2019	0.1	Email opposing counsel re: signed settlement agreement; email case team IJL's signed agreement.	MWS	\$890	\$89
9/10/2019	0.2	Follow up with lead Plaintiff re: signed settlement agreement; discuss same with case team:	KMB	\$340	\$68
9/11/2019	0.2	Discuss case status and next steps with case team; review preliminary approval order.	JGB	\$690	\$138
9/11/2019	0.6	Review amended settlement agreement; review preliminary approval order; discuss order and next steps with case team.	MWS	\$890	\$534
9/11/2019	1.3	Draft and edit motion memorandum; circulate to KMB; sort emails.	ACB	\$560	\$728
9/11/2019	1.2	Discuss amended settlement agreement and next steps with case team; file amended settlement documents with the Court; email word version of proposed order to the court; save, sort, and code documents into case management system.	KMB	\$340	\$408
9/11/2019	0.1	Discuss case status and next steps with KMB.	ACB	\$560	\$0
9/12/2019	0.3	Review and edit motion memorandum for attorneys' fees.	MWS	\$890	\$267
9/12/2019	2.1	Edit motion memorandum; discuss same with KMB; review MWS's comments thereto; circulate to JGB; emails with case team; sort emails.	ACB	\$560	\$1,176

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/12/2019	0.8	Discuss motion memorandum for attorneys' fees with ACB; review and edit motion memorandum.	KMB	\$340	\$272
9/13/2019	0.2	Discuss notifying claims administrator and next steps with KMB.	MWS	\$890	\$178
9/13/2019	0.1	Review Plan for case team; sort emails.	ACB	\$560	\$56
9/13/2019	0.4	Complete weekly review, update, and organization of case files; follow up with opposing counsel re: submitting documents to claims administrator.	KMB	\$340	\$136
9/15/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
9/17/2019	0.1	Review email exchange between case team, opposing counsel, and claims administrator re: class notice.	JGB	\$690	\$69
9/17/2019	0.2	Discuss class notices and next steps with case team; review email exchange between case team, opposing counsel, and claims administrator re: same.	MWS	\$890	\$178
9/17/2019	0.3	Email exchange with opposing counsel, case team, and claims administrator re: classes notices.	KMB	\$340	\$102
9/20/2019	0.1	Complete weekly review, update, and organization of case files.	KMB	\$340	\$34
9/23/2019	0.2	Review case plan memorandum; discuss case status and next steps with PSG.	KMB	\$340	\$68
9/25/2019	0.2	Review email exchange with case team and opposing counsel re: settlement agreement; email claims administrator the claim form in word format.	KMB	\$340	\$68
9/26/2019	0.3	Discuss defendant inquiry re: settlement language with case team.	MWS	\$890	\$267

Bill Date	Duration	Description	Staff	Rate	Billed Amount
9/26/2019	0.9	Discuss opposing counsel's questions with ACB; review settlement agreement; email case team answers to questions.	KMB	\$340	\$306
9/27/2019	0.1	Draft and email case plan memorandum to case team; discuss case status and next steps with case team.	MWS	\$890	\$89
9/27/2019	1.5	Complete weekly review, update, and organization of case files; draft monthly update; email draft update to MWS.	KMB	\$340	\$510
9/28/2019	0.2	Email opposing counsel responses to settlement agreement questions.	MWS	\$890	\$178
9/29/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
9/30/2019	0.4	Review email case plan memorandum; discuss case status and next steps with PSG; monthly review of documents, filings, contacts, and other summary and general case information.	KMB	\$340	\$136
9/30/2019	0.1	Discuss class member follow up with case team.	JGB	\$690	\$69
9/30/2019	0.1	Review next steps and deadlines.	ACB	\$560	\$56
9/30/2019	1.3	Discuss communication with class members and related issues with case team; revise and revise update to class members; discuss same with KMB.	MWS	\$890	\$1,157
10/1/2019	0.4	Discuss class member notice, next steps, and related issues with case team.	MWS	\$890	\$356
10/1/2019	1.2	Review mailer from claims administrator; multiple calls with claim administrator re: notices; discuss calls with case team; draft email to opposing counsel re: list of IJL locations.	KMB	\$340	\$408
10/2/2019	0.9	Set internal deadline schedule; consult with KMB as to availability during relevant briefing period; review and edit self mailer form; sort emails.	ACB	\$560	\$504

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/2/2019	0.2	Discuss short notice and next steps with case team; review email from opposing counsel re: franchise locations.	MWS	\$890	\$178
10/2/2019	0.7	Discuss case status and next steps with case team; review notice; discuss notice issues with case team.	KMB	\$340	\$238
10/3/2019	0.4	Review email language to Shapiro; review and edit redline of short form notice; sort emails.	ACB	\$560	\$224
10/3/2019	0.2	Discuss class notice with case team; review email exchanges with case team and claims administrator.	MWS	\$890	\$178
10/3/2019	1.1	Discuss case status and next steps with PSG; phone call with claims administrator re: deadline to submit claims; discuss same with case team; review and edit notice to class members; email clean and redline versions of notice to claims administrator and opposing counsel.	KMB	\$340	\$374
10/4/2019	0.1	Discuss case status and next steps with case team.	MWS	\$890	\$89
10/4/2019	0.1	Complete weekly review, update, and organization of case files; discuss case status and next steps with case team.	KMB	\$340	\$34
10/7/2019	0.1	Discuss case status and next steps with PSG.	KMB	\$340	\$34
10/7/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$0	\$0
10/7/2019	1.4	Draft case plan memorandum; discuss fee motion with case team; discuss notice documents with claims administrator and case team.	MWS	\$890	\$1,246
10/8/2019	0.4	Discuss changes to claims forms and notices with case team.	MWS	\$890	\$356
10/8/2019	1.4	Discuss case status and next steps with DAF; review all notices and forms for class members; email case team thoughts; follow up with claims administrator re: same.	KMB	\$340	\$476

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/9/2019	0.2	Discuss class notices, IJL website, and next steps with with case team.	MWS	\$890	\$178
10/9/2019	0.5	Review email notice to class members; discuss edits with case team; email exchanges with claims administrator re: notices.	KMB	\$340	\$170
10/10/2019	0.1	Discuss status of class notices and next steps with case team.	MWS	\$890	\$89
10/10/2019	0.9	Discuss case status and next steps with ACB; discuss class notice with claims administrator and case team.	KMB	\$340	\$306
10/10/2019	0.1	Discuss case status and next steps with KMB.	ACB	\$560	\$56
10/11/2019	0.2	Staff meeting re: calling class members.	SZL	\$340	\$68
10/11/2019	0.4	Discuss case status and next steps with case team; phone call with opposing counsel re: class notice.	MWS	\$890	\$356
10/11/2019	0.2	Discuss returning clients' calls re: settlement with case team.	EDS	\$340	\$68
10/11/2019	2.1	Draft and edit preliminary statement of brief seeking fees; circulate summary memorandum; evidence table; and brief seeking fees to case team.	ACB	\$560	\$1,176
10/11/2019	2.3	Complete weekly review, update, and organization of case files; phone calls with claims administrator re: website and class notices; discuss same with case team; discuss procedure with follow up to class members re: class notice.	KMB	\$340	\$782
10/11/2019	0.2	Discuss next steps with KMB and analysts.	ETK	\$340	\$68
10/11/2019	0.1	Discuss case status and next steps with KMB.	HS	\$340	\$34
10/12/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/14/2019	0.9	Review next steps and confirm strategy with case team; review edits to Motion for fees.	ACB	\$560	\$504
10/15/2019	0.6	Discuss class notices and next steps for handling class member calls with case team.	MWS	\$890	\$534
10/15/2019	0.1	Discuss case status and next steps with case team.	JGB	\$690	\$69
10/15/2019	0.4	Review case plan memorandum; follow up with claims administrator re: call center; discuss same with case team.	KMB	\$340	\$136
10/17/2019	0.1	Discuss case status and next steps with PSG.	KMB	\$340	\$34
10/17/2019	0.1	Discuss case status and next steps with KMB.	PSG	\$0	\$0
10/18/2019	0.6	Discuss class member follow up with case team; draft and send case plan memorandum to case team.	MWS	\$890	\$534
10/18/2019	0.7	Complete weekly review, update, and organization of case files; discuss class member follow up with case team and claims administrator; discuss compiling voice mails with MJN; email all voice mails to claim administrator.	KMB	\$340	\$238
10/21/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/21/2019	0.1	Review case plan memorandum.	KMB	\$340	\$34
10/24/2019	0.2	Discuss interim schedule for fees brief with MWS and circulate schedule.	ACB	\$560	\$112
10/25/2019	0.2	Draft and send case plan memorandum to case team.	MWS	\$890	\$178
10/25/2019	0.2	Complete weekly review, update, and organization of case files; email class member calls to claim administrator.	KMB	\$340	\$68
10/25/2019	2.1	Draft motion for fees memorandum.	ACB	\$560	\$1,176

Bill Date	Duration	Description	Staff	Rate	Billed Amount
10/27/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
10/28/2019	0.9	Draft motion for fees.	ACB	\$560	\$504
10/28/2019	0.1	Review case plan memorandum.	KMB	\$340	\$34
10/29/2019	4	Draft and edit motion for fees.	ACB	\$560	\$2,240
10/30/2019	2.6	Edit second motion for attorneys' fees.	ACB	\$560	\$1,456
10/30/2019	0.2	Email docket sheet to ACB.	KMB	\$340	\$68
10/31/2019	0.3	Monthly review of documents, filings, contacts, and other summary and general case information; review case plan memorandum; follow up with claims administrator re: class member phone calls.	KMB	\$340	\$102
10/31/2019	0.1	Review and update hours for month of October.	ACB	\$560	\$56
11/1/2019	0.1	Draft and send case plan memorandum to case team.	MWS	\$890	\$89
11/2/2019	3.4	Draft Second Motion for Attorneys' Fees.	ACB	\$560	\$1,904
11/3/2019	0.1	Review and provide thoughts on case plan memorandum.	JGB	\$690	\$69
11/3/2019	0.8	Review and revise fee brief.	MWS	\$890	\$712
11/4/2019	0.1	Review case plan memorandum.	KMB	\$340	\$34
11/4/2019	0.2	Discuss fee brief with case team.	MWS	\$890	\$178
11/5/2019	5.2	Edit Memorandum of Law Seeking Attorneys' Fees; request calculation of costs and expenses/.	ACB	\$560	\$2,912
11/5/2019	0.7	Discuss fee brief with case team; review same.	MWS	\$890	\$623
11/6/2019	8.4	Review relevant facts and statistics with KMB and EDS regarding motion for fees; edit memorandum of law in support of motion for fees; edit declaration of JGB in support of motion for fees.	ACB	\$560	\$4,704

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/6/2019	0.2	Discuss motion for attorneys' fees with case team.	MWS	\$890	\$178
11/6/2019	0.4	Discuss filing motion for fees, case status, and next steps with ACB.	EDS	\$340	\$136
11/6/2019	1.4	Discuss case status and next steps with ACB; review previous motion for attorneys' fees; compare taxable and non-taxable expenses from previous motion to current expenses; discuss comparing all taxable costs with expenses in case management system with HS.	KMB	\$340	\$476
11/6/2019	0.8	Compare all taxable costs with expenses in case management system; discuss same with KMB.	HS	\$340	\$272
11/7/2019	0.1	Discuss case status and next steps with PSG.	HS	\$340	\$34
11/7/2019	0.2	Discuss case status and next steps with HS and EDS.	PSG	\$0	\$0
11/7/2019	0.4	Discuss case status and next steps with PSG; discuss motion for fees and billing for matter with ACB; export billing data for matter from case management system.	EDS	\$340	\$136
11/7/2019	10.1	Draft Declaration of JGB in support of motion for fees; edit memorandum of law in support of fees; direct analysis of hours and expenses.	ACB	\$560	\$5,656
11/7/2019	0.2	Review and discuss objection letter with case team.	MWS	\$890	\$178
11/8/2019	7.6	Edit Memorandum of Law in Support of Motion for Fees; Draft Exhibits to Balestriere Declaration.	ACB	\$560	\$4,256
11/8/2019	3.7	Discuss case status and next steps with TML and ACB; review and edit citations in motion for fees; draft chart re: staff rates.	EDS	\$340	\$1,258
11/8/2019	0.2	Draft and email case plan memorandum to case team.	MWS	\$890	\$178

Bill Date	Duration	Description	Staff	Rate	Billed Amount
11/8/2019	0.1	No Charge: Discuss case status and next steps with EDS.	TML	\$0	\$0